



DEPARTMENT OF VETERANS AFFAIRS

Muskogee Regional Office
PO Box 8888
Muskogee OK 74402-8888

April 3, 2018

TRACY HEAP
KLAMATH COMMUNITY COLLEGE
7390 SOUTH 6TH STREET
KLAMATH FALLS OR 97603

In Reply Refer To:
351/22
1-4-9194-37

Mr. Heap:

This letter is in reference to the compliance survey of Klamath Community College by United States Department of Veterans Affairs (VA) representatives initiated on July 17, 2017. Attached you will find a detailed report of the 45 student records reviewed during this survey. This attachment will provide more specific information concerning the individual discrepancies listed on our findings letter of January 18, 2018.

Please do not submit any additional certification corrections through VA-Once on the specific student discrepancies provided.

What You Should Do

If you have questions or require assistance with any VA regulations or requirements, please contact Ms. Kate Nicholson, the VA Education Liaison Representative for Oregon, by phone at (503) 412-4669 or email at Katherine.Nicholson@va.gov.

Sincerely yours,

Stewart Land

Education Compliance Survey Specialist

Enclosures: Compliance survey detailed report

The facility provided the records and accounts of VA beneficiaries and other students for examination. (38 CFR §21.4209, 21.7307, 21.9770)

Facts: In the case of R B Flowe (XXX XX 3328)

Student was a Chapter 33 recipient. School failed to provide the records of VA beneficiary (flight logs). The Enrollment Certifications (VA Form 22-1999) received by VA, reported student was enrolled in AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-29-14/12-13-14	1 (res)	\$2,701

VA records reflect benefits were paid based on this certification. The student's transcript reflects student was enrolled in the AAS Aviation Science-Helicopter degree program and was enrolled in one single credit hour class this period:

AVS299 credit hour

However, the training conducted for AVS299 (Special Studies: Aviation Science) as certified to VA cannot be substantiated. Documentation from the school reflects this training was a helicopter private pilot add-on class. No flight training records or flight training logs were supplied by school to substantiate this training.

Facts: In the case of R B Flowe (XXX XX 3328)

Student was a Chapter 33 recipient. School failed to provide the records of VA beneficiary (flight logs). The Enrollment Certifications (VA Form 22-1999) received by VA, reported student was enrolled in AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
1-5-15/3-29-15	11 (7 res + 4 dis)	\$18,663

A subsequent certification received by VA reported a reduction of 7 (res) hours to 4 hours (dis) after drop/add period effective March 29, 2015, with punitive grades assigned with tuition and fees of \$474. VA records reflect benefits were paid based on this certification. The school calendar reflects the end date for this period was March 20, 2015, not March 29, 2015. The student's transcript reflects student was enrolled in the AAS Aviation Science-Helicopter degree program and was enrolled in three classes this period:

AVS150 4 credit hours
AVS200 5 credit hours
AVS200L 2 credit hours

However, the training conducted for AVS200 (Instrument/Commercial Flight 1: Helicopter) and AVS200L (Instrument/Commercial Flight 1 Lab: Helicopter) as certified to VA cannot be substantiated. No flight training records or flight training logs were supplied by school to substantiate this training.

Evaluation: The letter initially informing the school of the onsite compliance survey was sent June 29, 2017, included a request for access to student and school records with a specific request for flight training records. During the onsite portion of the compliance survey between July 17 and July 20 repeated requests for exhaustive student flight training records were made. Eventually, on August 8, 2017, additional documentation recorded on a CD-ROM was received via USPS from Nigel Cooper of PAT. The contents of the CD-ROM were discovered to be the TCOs and limited student flight training records. Although a closer review of the documentation received on the CD-ROM revealed only limited student flight training records were provided.

VA beneficiaries are enrolled in and pursuing the approved program as certified. (38 CFR §21.3030, 21.5131, 21.7130, 21.7630, 21.9710)

Facts: In the case of D T Auten (XXX XX 2725).

Student was a Chapter 33 recipient. The student was not enrolled in and pursuing the approved program as certified. The Enrollment Certifications (VA Form 22-1999) received by VA, reported student was enrolled in AAS Aviation Science Helicopter degree program for the following terms:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
3-28-16/6-19-16	14	\$1,664
6-20-16/9-25-16	13 (7 res + 6 dis)	\$27,183

The school calendar reflects correct term dates for the spring 2016 enrollment period was March 28, 2016, to June 10, 2016, and the summer 2016 enrollment period was actually June 20, 2016, to August 19, 2016. The student's transcripts reflects enrollment in the AAS Aviation Science Helicopter degree program.

Facts: In the case of J L Bende (XXX XX 0622).

Student was a Chapter 33 recipient. The student was not enrolled in and pursuing the approved program as certified. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
4-3-17/6-16-17	12 (4 res + 8 dis)	\$19,769.04

A subsequent certification received by VA corrected the tuition and fee amount to \$19,796.04. The student's transcripts reflects enrollment in the AAS Aviation Science Helicopter degree program.

Facts: In the case of J K Binni (XXX XX 1159).

Student was a Chapter 33 recipient. The student was not enrolled in and pursuing the approved program as certified. The Enrollment Certifications (VA Form 22-1999) received by VA, reported student was enrolled in AAS Aviation Science Helicopter degree program for the following terms:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-28-15/1-3-16-15	15	\$26,885
1-4-16/3-27-16	14	\$27,151.50
3-28-16/6-19-16	16	\$37,181
6-20-16/9-25-16	13	\$1,645.50

The student's transcripts reflects enrollment in the AAS Aviation Science Helicopter degree program.

Facts: In the case of R M Calki (XXX XX 5972).

Student was a Chapter 33 recipient. The student was not enrolled in and pursuing the approved program as certified. The Enrollment Certifications (VA Form 22-1999) received by VA, reported student was enrolled in AAS Aviation Science Helicopter degree program for the following terms:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-28-15/1-3-16	15 (7 res + 8 dis)	\$26,885
1-4-16/3-27-16	8 (dis)	\$953
3-28-16/6-19-16	7 (res)	\$834.50
6-20-16/9-25-16	7 (res)	\$26,422
9-26-16/1-6-17	3 (dis)	\$410.50
1-9-17/3-24-17	3 (dis)	\$360.50

The student's transcripts reflects enrollment in the AAS Aviation Science Helicopter degree program.

AR04546

Facts: In the case of J W Cowan (XXX XX 5097).

Student was a Chapter 33 recipient. The student was not enrolled in and pursuing the approved program as certified. The Enrollment Certifications (VA Form 22-1999) received by VA, reported student was enrolled in AAS Aviation Science Helicopter degree program for the following terms:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
1-5-15/3-29-15	15	\$25,295
3-30-15/6-12-15	11	\$18,663
6-21-15/9-27-15	8	\$10,186.50
9-28-15/1-3-16	8	\$3,786
1-4-16/3-27-16	13	\$1,545.50

The student's transcripts reflects enrollment in the AAS Aviation Science Helicopter degree program.

Facts: In the case of R B Flowe (XXX XX 3328)

Student was a Chapter 33 recipient. The student was not enrolled in and pursuing the approved program as certified. The Enrollment Certifications (VA Form 22-1999) received by VA, reported student was enrolled in AAS Aviation Science Helicopter degree program for the following terms:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-29-14/12-12-14	1 (res)	\$2,701
1-5-15/3-20-15	11 (7 res + 4 dis)	\$18,663
3-30-15/6-12-15	4 (dis)	\$479
6-22-15/8-21-15	14 (10 res + 4 dis)	\$33,085
9-28-15/12-11-15	3 (res)	\$306

The student's transcripts reflects enrollment in the AAS Aviation Science Helicopter degree program.

Facts: In the case of D L Ganno (XXX XX 5292).

Student was a Chapter 33 recipient. The student was not enrolled in and pursuing the approved program as certified. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
1-9-17/3-24-17	12 (dis)	\$1,427

However, the student's transcript reflects enrollment in the AAS Aviation Science Airplane degree program not the Helicopter program.

Facts: In the case of S R Gayle (XXX XX 7004)

Student was a Chapter 33 recipient. The student was not enrolled in and pursuing the approved program as certified. The Enrollment Certifications (VA Form 22-1999) received by VA, reported student was enrolled in AAS Aviation Science Helicopter degree program for the following terms:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
1-5-15/3-20-15	7 (res)	\$25,255
3-30-15/6-12-15	11 (7 res + 4 dis)	\$18,663
6-22-15/8-21-15	5 (1 res + 4 dis)	\$9,831
9-28-15/12-11-15	15 (11 res + 4 dis)	\$1,601
1-4-16/3-18-16	14 (res)	\$36,878
3-28-16/6-10-16	13 (dis)	\$1,545.50
9-26-16/12-9-16	11 (7 res + 4 dis)	\$27,898

The student's transcripts reflects enrollment in the AAS Aviation Science Helicopter degree program.

Facts: In the case of A C Grant (XXX XX 0942)

Student was a Chapter 33 recipient. The student was not enrolled in and pursuing the approved program as certified. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in AAS Aviation Science Helicopter degree program for the following terms:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
1-4-16/3-27-16	7 (res)	\$13,489

The student's transcripts reflects enrollment in the AAS Aviation Science Airplane degree program.

Facts: In the case of A C Grant (XXX XX 0942)

Student was a Chapter 33 recipient. The student was not enrolled in and pursuing the approved program as certified. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in AAS Aviation Science Helicopter degree program for the following terms:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
1-4-16/3-27-16	7 (res)	\$13,489

However, the student's transcripts reflects enrollment in the AAS Aviation Science Airplane degree program, not in the Helicopter program.

AR04548

Facts: In the case of N C Harri (XXX XX 0704)

Student was a Chapter 33 recipient. The student was not enrolled in and pursuing the approved program as certified. The Enrollment Certifications (VA Form 22-1999) received by VA, reported student was enrolled in AAS Aviation Science Helicopter degree program for the following terms:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
6-21-15/9-27-15	11 (7 res + 4 dis)	\$13,793
9-28-15/1-3-16	3 (dis)	\$355.50
1-4-16/3-27-16	10 (dis)	\$1.190
3-28-16/6-19-16	7 (dis)	\$834.50
6-20-16/9-25-16	7 (1res + 6 dis)	\$5,968

However, the student's transcripts reflects enrollment in the AAS Aviation Science Airplane degree program, not in the Helicopter program.

Facts: In the case of N C Harri (XXX XX 0704)

Student was a Chapter 33 recipient. The student was not enrolled in and pursuing the approved program as certified. The Enrollment Certifications (VA Form 22-1999) received by VA, reported student was enrolled in AAS Aviation Science Helicopter degree program for the following terms:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
6-21-15/9-27-15	11 (7 res + 4 dis)	\$13,793
9-28-15/1-3-16	3 (dis)	\$355.50
1-4-16/3-27-16	10 (dis)	\$1.190
3-28-16/6-19-16	7 (dis)	\$834.50
6-20-16/9-25-16	7 (1res + 6 dis)	\$5,968

However, the student's transcripts reflects enrollment in the AAS Aviation Science Airplane degree program, not in the Helicopter program.

Facts: In the case of R W Jones (XXX XX 0124)

Student was a Chapter 33 recipient. The student was not enrolled in and pursuing the approved program as certified. The Enrollment Certifications (VA Form 22-1999) received by VA, reported student was enrolled in AAS Aviation Science Helicopter degree program for the following terms:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-26-16/1-6-17	15 (8 res + 7 dis)	\$32,524.50
1-9-17/3-24-17	9 (2 res + 7 dis)	\$15,798.50

The student's transcripts reflects enrollment in the AAS Aviation Science Helicopter degree program.

Facts: In the case of K E Kauff (XXX XX 9285)

Student was a Chapter 33 recipient. The student was not enrolled in and pursuing the approved program as certified. The Enrollment Certifications (VA Form 22-1999) received by VA, reported student was enrolled in AAS Aviation Science Helicopter degree program for the following terms:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
6-21-15/9-27-15	15 (7 res+8 dis)	\$1,662
9-28-15/1-3-16	18 (14 res+4 dis)	\$34,932
1-4-16/3-27-16	14 (res)	\$36,878
3-28-16/6-19-16	12 (5 res+7 dis)	\$18,079.50
6-20-16/9-25-16	14 (11 res+3 dis)	\$26,498.50
9-26-16/1-6-17	12 (8 res+4 dis)	\$1,345
1-9-17/3-24-17	12 (8 res+4 dis)	\$16,055
4-3-17/6-16-17	4 (res)	\$14,093

The student's transcripts reflects enrollment in the AAS Aviation Science Helicopter degree program.

Facts: In the case of W E King (XXX XX 3510).

Student was a Chapter 35 recipient. The student was not enrolled in and pursuing the approved program as certified. Enrollment Certifications (VA Form 22-1999) received by VA, reported student was enrolled in the Associate of General Studies degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-28-15/12-18-15	12 (res)	\$1,674
1-4-16/3-18-16	10 (res)	\$1,450
3-28-16/6-10-16	10 (res)	N/A
6-20-16/8-19-16	10 (res)	N/A
9-26-16/12-9-16	13 (res)	N/A
1-9-17/3-24-17	10 (res)	N/A
4-3-17/6-16-17	10 (res)	N/A

However, school records reflect the student was pursuing the AASAT Automotive Technology degree program during these periods.

AR04550

Facts: In the case of D W Larim (XXX XX 4893)

Student was a Chapter 33 recipient. The student was not enrolled in and pursuing the approved program as certified. The Enrollment Certifications (VA Form 22-1999) received by VA, reported student was enrolled in AAS Aviation Science Helicopter degree program for the following terms:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
1-5-15/3-20-15	15 (7 res + 8 dis)	\$25,255
3-30-15/6-12-15	14 (10 res + 4 dis)	\$18,969
6-22-15/8-21-15	8 (4 dis + 4 r/d)	\$887
9-28-15/12-11-15	7 (res)	\$719
1-4-16/3-18-16	11 (4 res + 7 dis)	\$1,242.50
3-28-16/6-10-16	13 (10 res + 3 dis)	\$36,825.50
6-20-16/8-19-16	10 (3 res + 7 dis)	\$1,240.50
9-26-16/12-9-16	7 (3 dis + 4 r/d)	\$818.50
1-9-17/3-24-17	4 (r/d)	\$413
4-3-17/6-16-17	7 (res)	\$14,399

The student's transcripts reflects enrollment in the AAS Aviation Science Helicopter degree program.

Facts: In the case of N L Lawso (XXX XX 7037)

Student was a Chapter 33 recipient. The student was not enrolled in and pursuing the approved program as certified. The Enrollment Certifications (VA Form 22-1999) received by VA, reported student was enrolled in AAS Aviation Science Airplane degree program for the following terms:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
3-30-15/6-12-15	11 (7 res + 4 dis)	\$13,753
6-21-15/9-27-15	8 (dis)	\$953
9-28-15/1-3-16	6 (dis)	\$716
3-28-16/6-19-16	12 (res)	\$32,119
6-20-16/9-25-16	7 (dis)	\$934.50

The student's transcripts reflects enrollment in the AAS Aviation Science Airplane degree program.

Facts: In the case of J M Louis (XXX XX 3907)

Student was a Chapter 33 recipient. The student was not enrolled in and pursuing the approved program as certified. The Enrollment Certifications (VA Form 22-1999) received by VA, reported student was enrolled in AAS Aviation Science Helicopter degree program for the following terms:

AR04551

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
1-5-15/3-20-15	15 (7 res + 8 dis)	\$25,295
3-30-15/6-12-15	11 (7 res + 4 dis)	\$18,663
6-22-15/8-21-15	9 (1 res + 8 dis)	\$10,305
9-28-15/12-11-15	7 (1 res + 6 dis)	\$3,668
1-4-16/3-18-16	13 (dis)	\$1,545.50

The student's transcripts reflects enrollment in the AAS Aviation Science Helicopter degree program.

Facts: In the case of R A Lupke (XXX XX 6940)

Student was a Chapter 33 recipient. The student was not enrolled in and pursuing the approved program as certified. The Enrollment Certifications (VA Form 22-1999) received by VA, reported student was enrolled in AAS Aviation Science Helicopter degree program for the following terms:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-29-14/12-13-14	17 (res)	\$45,489

The student's transcripts reflects enrollment in the AAS Aviation Science Helicopter degree program.

Facts: In the case of C E Mann (XXX XX 1395)

Student was a Chapter 33 recipient. The student was not enrolled in and pursuing the approved program as certified. The Enrollment Certifications (VA Form 22-1999) received by VA, reported student was enrolled in AAS Aviation Science Helicopter degree program for the following terms:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
6-22-15/8-21-15	4 (dis)	\$479
9-28-15/12-11-15	8 (res)	\$24,296

The student's transcripts reflects enrollment in the AAS Aviation Science Helicopter degree program.

AR04552

Facts: In the case of C R Marti (XXX XX 4862)

Student was a Chapter 33 recipient. The student was not enrolled in and pursuing the approved program as certified. The Enrollment Certifications (VA Form 22-1999) received by VA, reported student was enrolled in AAS Aviation Science Helicopter degree program for the following terms:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
1-5-15/3-20-15	15 (7 res + 8 dis)	\$25,255
3-30-15/6-12-15	15 (7 res + 8 dis)	\$19,137
6-21-15/8-21-15	8 (res)	\$821
9-28-15/12-11-15	7 (dis)	\$839.50
1-4-16/3-18-16	8 (4 res + 4 dis)	\$887
3-28-16/6-10-16	9 (3 res + 6 dis)	\$1,022
4-3-17/6-16-17	7 (res)	\$15,531.20

The student's transcripts reflects enrollment in the AAS Aviation Science Helicopter degree program.

Facts: In the case of CR Montg (XXX XX 3574)

Student was a Chapter 33 recipient. The student was not enrolled in and pursuing the approved program as certified. The Enrollment Certifications (VA Form 22-1999) received by VA, reported student was enrolled in AAS Aviation Science Airplane degree program for the following terms:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-28-15/1-3-16	7 (res)	\$16,415
1-4-16/3-27-16	12 (dis)	\$1,901
3-28-16/6-19-16	12 (dis)	\$1,427

The student's transcripts reflects enrollment in the AAS Aviation Science Airplane degree program.

Facts: In the case of M P Nelan (XXX XX 3349),

Student was a Chapter 33 recipient. The student was not enrolled in and pursuing the approved program as certified. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the Associate of Technical Studies degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-26-16/12-9-16	8 (dis)	\$716

However, school records reflect the student was pursuing the Associate of General Studies (AGS) degree program during this period.

Facts: In the case of M J Nordi (XXX XX 2226)

Student was a Chapter 33 recipient. The student was not enrolled in and pursuing the approved program as certified. The Enrollment Certifications (VA Form 22-1999) received by VA, reported student was enrolled in AAS Aviation Science Helicopter degree program for the following terms:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-29-14/12-13-14	12 (8 dis + 4 r/d)	\$1,361
1-5-15/3-29-15	12 (8 dis + 4 r/d)	\$1,467

The student's transcripts reflects enrollment in the AAS Aviation Science Helicopter degree program.

Facts: In the case of J D Raude (XXX XX 7512)

Student was a Chapter 33 recipient. The student was not enrolled in and pursuing the approved program as certified. The Enrollment Certifications (VA Form 22-1999) received by VA, reported student was enrolled in AAS Aviation Science Helicopter degree program for the following terms:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-28-15/1-3-16	15 (7 res + 8 dis)	\$26,885
1-4-16/3-27-16	12 (dis)	\$1,427
3-28-16/6-19-16	16 (dis)	\$1,901

The student's transcripts reflects enrollment in the AAS Aviation Science Helicopter degree program.

Facts: In the case of D J Richc (XXX XX 9612)

Student was a Chapter 33 recipient. The student was not enrolled in and pursuing the approved program as certified. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
3-30-15/6-12-15	15 (3 res+8 dis+4 r/d)	\$1,667

The student's transcripts reflects enrollment in the AAS Aviation Science Helicopter degree program.

Facts: In the case of W J Rober (XXX XX 3166)

Student was a Chapter 33 recipient. The student was not enrolled in and pursuing the approved program as certified. The Enrollment Certifications (VA Form 22-1999) received by VA, reported student was enrolled in AAS Aviation Science Helicopter degree program for the following terms:

AR04554

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-28-15/1-3-16	15 (7 res + 8 dis)	\$31,285
1-4-16/3-27-16	12 (dis)	\$1,427
3-28-16/6-19-16	13 (res)	\$26,934
6-20-16/9-25-16	15 (4 res + 11 dis)	\$1,866.50
9-26-16/1-6-17	13 (res)	\$36,876
4-3-17/6-16-17	6 (dis)	\$716

The student's transcripts reflects enrollment in the AAS Aviation Science Helicopter degree program.

Facts: In the case of W R Sharp (XXX XX 0741)

Student was a Chapter 33 recipient. The student was not enrolled in and pursuing the approved program as certified. The Enrollment Certifications (VA Form 22-1999) received by VA, reported student was enrolled in AAS Aviation Science Helicopter degree program for the following terms:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-26-16/12-9-16	13 (6 res + 7 dis)	\$22,540.50
1-9-17/3-24-17	9 (2 res + 7 dis)	\$15,798.50

The student's transcripts reflects enrollment in the AAS Aviation Science Helicopter degree program.

Facts: In the case of L A Simsh (XXX XX 7596)

Student was a Chapter 33 recipient. The student was not enrolled in and pursuing the approved program as certified. The Enrollment Certifications (VA Form 22-1999) received by VA, reported student was enrolled in AAS Aviation Science Helicopter degree program for the following terms:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
6-20-16/9-25-16	14 (dis)	\$2,022.50
1-9-17/3-24-17	12 (dis)	\$1,427

The student's transcripts reflects enrollment in the AAS Aviation Science Helicopter degree program.

Facts: In the case of K M Taff (XXX XX 1688)

Student was a Chapter 33 recipient. The student was not enrolled in and pursuing the approved program as certified. The Enrollment Certifications (VA Form 22-1999) received by VA, reported student was enrolled in AAS Aviation Science Helicopter degree program for the following terms:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-28-15/12-11-15	15 (7 res + 8 dis)	\$26,845
1-4-16/3-18-16	12 (dis)	\$1,467

3-28-16/6-10-16	13 (7 res + 6 dis)	\$27,033
6-20-16/8-19-16	13 (10 res + 3 dis)	\$36,925.50
9-26-16/12-9-16	13 (7 res + 6 dis)	\$28,135
1-9-17/3-24-17	13 (2 res + 11 dis)	\$16,272.50
4-3-17/6-16-17	7 (dis)	\$834.50

The student's transcripts reflects enrollment in the AAS Aviation Science Helicopter degree program.

Facts: In the case of L T Thorb (XXX XX 9124)

Student was a Chapter 33 recipient. The student was not enrolled in and pursuing the approved program as certified. The Enrollment Certifications (VA Form 22-1999) received by VA, reported student was enrolled in AAS Aviation Science Helicopter degree program for the following terms:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
6-22-15/8-21-15	15 (7 res + 8 dis)	\$31,325
9-28-15/12-11-15	17 (10 res + 7 dis)	\$34,839.50
1-4-16/3-18-16	13 (10 res + 3 dis)	\$36,823
3-28-16/6-10-16	13 (5 res + 8 dis)	\$18,198

The student's transcripts reflects enrollment in the AAS Aviation Science Helicopter degree program.

Facts: In the case of L H Troun (XXX XX 1877)

Student was a Chapter 33 recipient. The student was not enrolled in and pursuing the approved program as certified. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-29-14/12-13-14	17 (res)	\$45,489

The student's transcripts reflects enrollment in the AAS Aviation Science Helicopter degree program.

Facts: In the case of S C Urban (XXX XX 1496)

Student was a Chapter 33 recipient. The student was not enrolled in and pursuing the approved program as certified. The Enrollment Certifications (VA Form 22-1999) received by VA, reported student was enrolled in AAS Aviation Science Helicopter degree program for the following terms:

AR04556

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-29-14/12-12-14	12 (8 res + 4 dis)	\$21,319
1-5-15/3-20-15	15 (7 res + 8 dis)	\$28,253
3-30-15/6-12-15	3 (dis)	\$360.50
6-22-15/8-21-15	12 (dis)	\$1,463.05

The student's transcripts reflects enrollment in the AAS Aviation Science Helicopter degree program.

Facts: In the case of K D Walke (XXX XX 3503)

Student was a Chapter 33 recipient. The student was not enrolled in and pursuing the approved program as certified. The Enrollment Certifications (VA Form 22-1999) received by VA, reported student was enrolled in AAS Aviation Science Helicopter degree program for the following terms:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
3-30-15/6-12-15	7 (res)	\$30,563
3-28-16/6-10-16	7 (res)	\$21,184

The student's transcripts reflects enrollment in the AAS Aviation Science Helicopter degree program.

Facts: In the case of J A Willb (XXX XX 9626)

Student was a Chapter 33 recipient. The student was not enrolled in and pursuing the approved program as certified. The Enrollment Certifications (VA Form 22-1999) received by VA, reported student was enrolled in AAS Aviation Science Helicopter degree program for the following terms:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
1-5-15/3-20-15	15 (7 res + 8 dis)	\$25,295
3-30-15/6-12-15	15 (7 res + 8 dis)	\$19,137
6-22-15/8-21-15	7 (dis)	\$834.50
9-28-15/12-11-15	12 (1 res + 11 dis)	\$4,260.50
1-4-16/3-18-16	14 (dis)	\$1,664
3-28-16/6-10-16	14 (10 res + 4 dis)	\$36,944
6-20-16/8-19-16	7 (dis)	\$834.50
4-3-17/6-16-17	10 (7 RES + 3 dis)	\$31,121

The student's transcripts reflects enrollment in the AAS Aviation Science Helicopter degree program.

AR04557

Facts: In the case of M B Wolf (XXX XX 0012)

Student was a Chapter 33 recipient. The student was not enrolled in and pursuing the approved program as certified. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
1-9-17/3-24-17	12 (dis)	\$1,427

The student's transcripts reflects enrollment in the AAS Aviation Science Helicopter degree program.

Evaluation: Several of these cases involve the school simply certifying the wrong program. However, in most of the cases listed above, the school is basing the flight training on Training Course Outlines (TCO) which VA has not approved at the contract facility; Precision Aviation Training LLC (PAT). Additionally, the total hours of training for the credit hour classes required for the degree program at KCC do not match the training hours for the vocational flight program which VA approved at PAT. The training hours for the classes required for the degree program offered by KCC, as shown in KCC's VIB, exceed the total hours which VA authorized for the vocational flight program at the contract facility.

- The TCO for the Instrument/Commercial Pilot SEL supplied by PAT for the flight degree programs at KCC reflects it is Revision #5 dated 5-21-15 with an FSDO stamped date of 5-12-15. However, WEAMS shows the most recent approval action for this program at PAT was dated 4-15-14. So, this could not have been the TCO which VA approved for the vocational flight programs at PAT. Additionally, WEAMS shows VA approved the Instrument/Commercial SEL vocational flight program at PAT for the following total hours:

Dual	80
Solo	35
Ground	60
Pre/post	28.75

The training required by this TCO appears to be delivered through the following credit hour classes for the degree program at KCC:

AVS202	Instrument/Commercial Pilot Stage 1-3: Airplane	5 credit hours
AVS202L	Lab	2 credit hours
AVS207	Instrument/Commercial Pilot Stage 4-6: Airplane	7 credit hours
AVS207L	Lab	5 credit hours

AR04558

However, the total hours of training for these credit hour classes do not match the approval listed in WEAMS. The training hours for these classes required for the degree program offered by KCC, as shown in KCC's VIB, exceed the total hours which VA authorized for the vocational flight program at the contract facility. The course descriptions in KCC's VIB reflect the following total training hours:

Dual	155
Solo	35
Ground	77
Pre/post	45

- The TCO for the Certified Flight Instructor Airplane ("Flight Instructor Certification Course Airplane Single Engine Land") supplied by PAT for the flight degree programs at KCC reflects it is Revision #6 dated 9-24-14 with an FSDO stamped date of 5-12-15. However, WEAMS shows most recent approval action for this program at PAT (CFI SEL) was dated 9-17-10. So, this could not have been the TCO which VA approved for the vocational flight programs at PAT. Additionally, WEAMS shows VA approved the CFI SEL vocational flight program at PAT for the following total hours:

Dual	25
Solo	0
Ground	40
Pre/post	6.25

The training required by this TCO appears to be delivered through the following credit hour classes at KCC:

AVS212	CFI: Airplane	4 hours
AVS212L	Lab	1 hour

However, the total hours of training for these credit hour classes do not match the approval listed in WEAMS. The training hours for these classes required for the degree program offered by KCC, as shown in KCC's VIB, exceed the total hours which VA authorized for the vocational flight program at the contract facility. The course descriptions in KCC's VIB reflect the following total training hours:

Dual	30
Solo	0
Ground	40
Pre/post	10

- The TCO for the Certified Flight Instructor Instrument Airplane (“Flight Instructor Instrument Certification Course Airplane Single Engine Land”) supplied by PAT for the flight degree programs at KCC reflects it is Revision #4 dated 5-21-15 with an FSDO stamped date of 5-12-15. However, WEAMS shows most recent approval action for this program at PAT was dated 4-15-14. So, this could not have been the TCO which VA approved for the vocational flight program at PAT. Additionally, WEAMS shows VA approved the CFI Instrument SEL program for the following total hours:

Dual	15
Solo	0
Ground	15
Pre/post	3.75

The training required by this TCO appears to be delivered through the following credit hour classes for the degree program at KCC:

AVS217	CFI Instrument: Airplane	4 hours
AVS217L	Lab	1 hour

However, the total hours of training for these credit hour classes do not match the approval listed in WEAMS. The training hours for these classes required for the degree program offered by KCC, as shown in KCC’s VIB, exceed the total hours which VA authorized for the vocational flight program at the contract facility. The course descriptions in KCC’s VIB reflect the following total training hours:

Dual	30
Solo	0
Ground	34
Pre/post	10

- The TCO for the Instrument/Commercial Helicopter (“Instrument/Commercial Certification Course Rotorcraft-Helicopter”) supplied by PAT for the flight degree programs at KCC reflects it is Revision #5 dated 9-29-14 with an FSDO stamped date of 5-12-15. However, WEAMS shows most recent approval action for this program at PAT was dated 4-15-14. So, this could not have been the TCO which VA approved for the vocational flight programs at PAT. Additionally, WEAMS shows VA approved the Instrument/Commercial Helicopter vocational flight program at PAT for the following total hours:

Dual	80
Solo	35
Ground	60
Pre/post	28.75

The training required by this TCO appears to be delivered through the following credit hour classes for the degree program at KCC:

AVS200	Instrument/Commercial Flight I: Helicopter	5 hours
AVS200L	Lab	2 hours
AVS205	Instrument/Commercial Flight II: Helicopter	7 hours
AVS205L	Lab	3 hours

However, the total hours of training for these credit hour classes do not match the approval listed in WEAMS. The training hours for these classes required for the degree program offered by KCC, as shown in KCC's VIB, exceed the total hours which VA authorized for the vocational flight program at the contract facility. The course descriptions in KCC's VIB reflect the following total training hours:

Dual	86.8
Solo	33
Ground	81
Pre/post	45

- The TCO for the Certified Flight Instructor Helicopter ("Flight Instructor Course Rotorcraft-Helicopter") supplied by PAT for the flight degree programs at KCC reflects it is Revision #9 dated 9-29-14 with an FSDO stamped date of 6-12-15. However, WEAMS shows most recent approval action for this program at PAT was dated 4-15-14. So, this could not have been the TCO which VA approved for the vocational flight programs at PAT. Additionally, WEAMS shows VA approved the CFI Helicopter vocational flight program at PAT for the following total hours:

Dual	25
Solo	0
Ground	40
Pre/post	6.25

The training required by this TCO appears to be delivered through the following credit hour classes for the degree program at KCC:

AVS210	CFI	4 hours
AVS210L	Lab	1 hours

AR04561

However, the total hours of training for these credit hour classes do not match the approval listed in WEAMS. The training hours for these classes required for the degree program offered by KCC, as shown in KCC's VIB, exceed the total hours which VA authorized for the vocational flight program at the contract facility. The course descriptions in KCC's VIB reflect the following total training hours:

Dual	25
Solo	0
Ground	40
Pre/post	20

- The TCO for the Certified Flight Instructor Instrument Helicopter ("Flight Instructor Instrument Certification Course Rotorcraft-Helicopter") supplied by PAT for the flight degree programs at KCC reflects it is Revision #4 dated 9-29-14 with an FSDO stamped date of 6-12-15. However, WEAMS shows most recent approval action for this program at PAT was dated 4-15-14. So, this could not have been the TCO which VA approved for the vocational flight programs at PAT. Additionally, WEAMS shows VA approved the CFI Instrument Helicopter vocational flight program at PAT for the following total hours:

Dual	15
Solo	0
Ground	15
Pre/post	3.75

The training required by this TCO appears to be delivered through the following credit hour classes for the degree program at KCC:

AVS215	CFI Instrument	4 hours
AVS215L	Lab	1 hour

However, the total hours of training for these credit hour classes do not match the approval listed in WEAMS. The training hours for these classes required for the degree program offered by KCC, as shown in KCC's VIB, exceed the total hours which VA authorized for the vocational flight program at the contract facility. The course descriptions in KCC's VIB reflect the following total training hours:

Dual	28
Solo	0
Ground	24
Pre/post	15

The facility maintains accurate, current and complete records of enrollment, correspondence lessons serviced, flight training hours or App/OJT hours. (38 CFR §21.4253, 21.4254)

Facts: In the case of J K Binni (XXX XX 1159),

Student was a Chapter 33 recipient. School failed to maintain accurate, current and complete records of flight training hours. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-28-15/1-3-16	15 (7 res + 8 dis)	\$26,885

The student's transcript reflects student was enrolled in the AAS Aviation Science-Helicopter degree program. The student's transcript reflects student was enrolled in four classes this period:

AVS100	4 credit hour (dis)
AVS105	4 credit hours (dis)
AVS110	3 credit hours
AVS115	4 credit hours

School catalog reflects the AVS110 is the Private Pilot Ground class and the AVS115 is the Private Pilot Flight: Helicopter class. Multiple requests were made to the school to supply the flight training records for the students included in the survey. However, no records were available for any flight training conducted during this period. Benefits cannot be justified for any classes involving flight training. Additionally, the school calendar reflects the end date for this period was December 11, 2015, not January 3, 2016. The correct enrollment for this period (the enrollment which VA can justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-28-15/12-11-15	8 (dis)	\$993

Facts: In the case of R M Calki (XXX XX 5972),

Student was a Chapter 33 recipient. School failed to maintain accurate, current and complete records of flight training hours. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-28-15/1-3-16	15 (7 res + 8 dis)	\$26,885

AR04563

The student's transcript reflects student was enrolled in the AAS Aviation Science-Helicopter degree program. The student's transcript reflects student was enrolled in four classes this period:

AVS150	4 credit hour (dis)
AVS105	4 credit hours (dis)
AVS110	3 credit hours
AVS115	4 credit hours

School catalog reflects the AVS110 is the Private Pilot Ground class and the AVS115 is the Private Pilot Flight: Helicopter class. Flight training records do not justify flight fees certified to VA. The individual invoices received justify the following:

19.45 hours dual@\$430 per hour=\$8,363.50
9.75 hours p/p@ \$65 per hour=\$633.75

Additional flight training records received reflect ground training between October 1, 2015, and July 21, 2016, and flight training between October 1, 2015, and August 3, 2016, but does not document fees charged. Documentation of a Private check ride occurring on August 1, 2016, was also reviewed. Insufficient records were made available for the flight training conducted during this period. Benefits cannot be justified for any classes involving flight training. Additionally, the school calendar reflects the end date for this period was December 11, 2015, not January 3, 2016. The correct enrollment for this period (the enrollment which VA can justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-28-15/12-11-15	8 (dis)	\$998

Facts: In the case of N C Harri (XXX XX 0704)

Student was a Chapter 33 recipient. School failed to maintain accurate, current and complete records of flight training hours. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
6-21-15/9-27-15	11 (7 res + 4 dis)	\$13,793

The student's transcripts reflects enrollment in the AAS Aviation Science Airplane degree program. The student's transcript reflects student was enrolled in four classes this period:

AVS155	4 credit hour (dis)
AVS202	5 credit hours (res)
AVS202L	2 credit hours (res)

School catalog reflects the AVS202 is the Instrument/Commercial Stage 1-3: Airplane; and the AVS202L is the Instrument/Commercial Stage 1-3 Lab: Airplane. Multiple requests were made to the school to supply the flight training records for the students included in the survey. However, only limited records were made available for the flight training conducted during this period. Flight training records provided only show training between September 8, 2016, and June 24, 2017, and mostly for AVS299 class. The school failed to maintain records for the flight training conducted during summer 2015 enrollment period. Benefits for this period cannot be justified for any classes involving flight training. Additionally, the school calendar reflects the dates for this period was June 22, 2015, through August 21, 2015. The correct enrollment for this period (the enrollment which VA could potentially justify benefits) was as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
6-22-15/8-21-15	4 (dis)	\$519

Facts: In the case of K E Kauff (XXX XX 9285).

Student was a Chapter 33 recipient. School failed to maintain accurate, current and complete records of flight training hours. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
6-21-15/9-27-15	15 (7 res+8 dis)	\$1,662

A subsequent certification reported an increase to 15 hours (7 res + 8 dis) effective on the first day of the term June 21, 2015, with tuition and fees of \$31,240. VA records reflect benefits were paid based on this certification. The student's transcript reflects student was enrolled in the AAS Aviation Science-Helicopter degree program. The student's transcript reflects student was enrolled in four classes this period:

AVS100	4 credit hour (dis)
AVS105	4 credit hours (dis)
AVS110	3 credit hours
AVS115	4 credit hours

School catalog reflects the AVS110 is the Private Pilot Ground class and the AVS115 is the Private Pilot Flight: Helicopter class. Multiple requests were made to the school to supply the flight training records for the students included in the survey. However, no records were available for any flight training conducted during this period. Benefits cannot be justified for any classes involving flight training. Additionally, the school calendar reflects the dates for this enrollment period were June 22, 2015, through August 21, 2015. The correct enrollment for this period (the enrollment which VA could potentially justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
6-22-15/8-21-15	8 (dis)	\$953

Facts: In the case of K E Kauff (XXX XX 9285),

Student was a Chapter 33 recipient. School failed to maintain accurate, current and complete records of flight training hours. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-28-15/1-3-16	18 (14 res+4 dis)	\$34,932

VA records reflect benefits were paid based on this certification. The student's transcript reflects student was enrolled in the AAS Aviation Science-Helicopter degree program. The student's transcript reflects student was enrolled in five classes this period:

AVS150	4 credit hour (dis)
AVS200	5 credit hours
AVS200L	2 credit hours
AVS299	1 credit hour
MTH060	4 credit hours

The school catalog and other documents reflect the AVS299 class is entitled Special Studies: Aviation Science and is an elective class involving contracted private pilot training. The AVS200 class is the Instrument/commercial Flight 1: Helicopter; and the AVS200L class is the Instrument/commercial Flight 1 Lab: Helicopter. Multiple requests were made to the school to supply the flight training records for the students included in the survey. However, no records were available for any flight training conducted during this period. Benefits cannot be justified for any classes involving flight training. Additionally, the school calendar reflects the dates for this enrollment period were September 28, 2015, through December 11, 2015. The correct enrollment for this period (the enrollment which VA could potentially justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-28-15/12-11-15	8 (4 res+4 dis)	\$887

Facts: In the case of N L Lawso (XXX XX 7037)

Student was a Chapter 33 recipient. School failed to maintain accurate, current and complete records of flight training hours. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Airplane degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
3-30-15/6-12-15	11 (7 res + 4 dis)	\$13,753

The student's transcript reflects student was enrolled in the AAS Aviation Science-Airplane degree program. The student's transcript reflects student was enrolled in three classes this period:

AVS150	4 credit hour (dis)
AVS202	5 credit hours
AVS202L	2 credit hours

School catalog reflects the AVS202 is the Instrument/Commercial Pilot Stage 1-3: Airplane class and the AVS202L is the Instrument/Commercial Pilot Stage 1-3 Lab: Airplane class. Multiple requests were made to the school to supply the flight training records for the students included in the survey. However, no records were available for any flight training conducted during this period. Benefits cannot be justified for any classes involving flight training this period. The correct enrollment for this period (the enrollment which VA can justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
3-30-15/6-12-15	4 (dis)	\$479

Facts: In the case of N L Lawso (XXX XX 7037)

Student was a Chapter 33 recipient. School failed to maintain accurate, current and complete records of flight training hours. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Airplane degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
3-28-16/6-10-16	12 (res)	\$32,119

The student's transcript reflects student was enrolled in the AAS Aviation Science-Airplane degree program. The student's transcript reflects student was enrolled in two classes this period:

AVS207	7 credit hours
AVS207L	5 credit hours

School catalog reflects the AVS207 is the Instrument/Commercial Pilot Stage 4-6: Airplane class and the AVS207L is the Instrument/Commercial Pilot Stage 4-6 Lab: Airplane class. Multiple requests were made to the school to supply the flight training records for the students included in the survey. However, no records were available for any flight training conducted during this period. Benefits cannot be justified for any classes involving flight training this period. None of the enrollment for this period can be justified for benefits.

AR04567

Facts: In the case of C R Marti (XXX XX 4862)

Student was a Chapter 33 recipient. School failed to maintain accurate, current and complete records of flight training hours. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
1-5-15/3-29-15	15 (7 res + 8 dis)	\$25,255

The student's transcript reflects student was enrolled in the AAS Aviation Science-Helicopter degree program. The student's transcript reflects student was enrolled in four classes this period:

AVS100	4 credit hour (dis)
AVS105	4 credit hours (dis)
AVS110	3 credit hours
AVS115	4 credit hours

School catalog reflects the AVS110 is the Private Pilot Ground class and the AVS115 is the Private Pilot Flight: Helicopter class. Multiple requests were made to the school to supply the flight training records for the students included in the survey. However, the flight training records provided by the school reflect training only between July 8, 2016, and June 5, 2017. No flight training records were available for any flight training conducted during this period. Benefits cannot be justified for any classes involving flight training. Additionally, the school calendar reflects the enrollment dates for this period was January 5, 2015, through March 20, 2015. The correct enrollment for this period (the enrollment which VA could potentially justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
1-5-15/3-20-15	8 (8 dis)	\$25,255

Facts: In the case of C R Marti (XXX XX 4862)

Student was a Chapter 33 recipient. School failed to maintain accurate, current and complete records of flight training hours. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
6-21-15/9-27-15	8 (res)	\$821

AR04568

A subsequent certification received by VA on July 8, 2015, reported an increase on first day of term to 9 hours (res) with tuition and fees of \$10,168. The student's transcript reflects student was enrolled in the AAS Aviation Science-Helicopter degree program. The student's transcript reflects student was enrolled in three classes this period:

MTH070	4 credit hours
WRI121	4 credit hours
AVS299	1 credit hour

The school catalog reflects the AVS299 is a Special Studies: Aviation Science class involving flight training. Multiple requests were made to the school to supply the flight training records for the students included in the survey. However, the flight training records provided by the school reflect training only between July 8, 2016, and June 5, 2017. No flight training records were available for any flight training conducted during this period. Benefits cannot be justified for any classes involving flight training. Additionally, the school calendar reflects the enrollment dates for this period was June 22, 2015, through August 21, 2015. The correct enrollment for this period (the enrollment which VA could potentially justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
6-22-15/8-21-15	8 (res)	\$953

Facts: In the case of W J Rober (XXX XX 3166),

Student was a Chapter 33 recipient. School failed to maintain accurate, current and complete records of flight training hours. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-28-15/1-3-16	15 (7 res + 8 dis)	\$31,285

The student's transcript reflects student was enrolled in the AAS Aviation Science-Helicopter degree program. The student's transcript reflects student was enrolled in four classes this period:

AVS100	4 credit hour (dis)
AVS105	4 credit hours (dis)
AVS110	3 credit hours
AVS115	4 credit hours

AR04569

School catalog reflects the AVS110 is the Private Pilot Ground class and the AVS115 is the Private Pilot Flight: Helicopter class. Multiple requests were made to the school to supply the flight training records for the students included in the survey. However, no records were available for any flight training conducted during this period. The flight training records provided by the school reflects only training between May 6, 2016, and June 13, 2017 and identifies training applied to the AVS200, AVS200L, AVS205, AVS205L classes. Benefits cannot be justified for any classes involving flight training during this enrollment period. Additionally, the school calendar reflects the end date for this period was December 11, 2015, not January 3, 2016. The correct enrollment for this period (the enrollment which VA can justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-28-15/12-11-15	8 (dis)	\$993

Facts: In the case of K M Taff (XXX XX 1688)

Student was a Chapter 33 recipient. School failed to maintain accurate, current and complete records of flight training hours. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-28-15/1-3-16	15 (7 res + 8 dis)	\$26,845

The student's transcript reflects student was enrolled in the AAS Aviation Science-Helicopter degree program. The student's transcript reflects student was enrolled in four classes this period:

AVS100	4 credit hour (dis)
AVS105	4 credit hours (dis)
AVS110	3 credit hours
AVS115	4 credit hours

School catalog reflects the AVS110 is the Private Pilot Ground class and the AVS115 is the Private Pilot Flight: Helicopter class. Multiple requests were made to the school to supply the flight training records for the students included in the survey. However, no records were available for any flight training conducted during this period. The flight training records supplied for this student began February 22, 2016. Benefits cannot be justified for any classes involving flight training during this period.

Facts: In the case of J A Willb (XXX XX 9626)

Student was a Chapter 33 recipient. School failed to maintain accurate, current and complete records of flight training hours. Enrollment Certifications (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following terms:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
1-5-15/3-20-15	15 (7 res + 8 dis)	\$25,295
3-30-15/6-12-15	15 (7 res + 8 dis)	\$19,137
6-22-15/8-21-15	7 (dis)	\$834.50
9-28-15/12-11-15	12 (1 res + 11 dis)	\$4,260.50

The student's transcript reflects student was enrolled in the AAS Aviation Science-Helicopter degree program. The student's transcript reflects student was enrolled in the following classes involving flight training during the periods indicated:

<u>Enrollment dates</u>	<u>Flight classes</u>
1-5-15/3-20-15	AVS110, AVS115
3-30-15/6-12-15	AVS200, AVS200L
6-22-15/8-21-15	AVS299
9-28-15/12-11-15	AVS107

Multiple requests were made to the school to supply the flight training records for the students included in the survey. However, no records were available for any flight training conducted during the periods shown above. The flight training records supplied for this student began May 17, 2016. Benefits cannot be justified for any classes involving flight training during these enrollment periods.

Facts: In the case of J A Willb (XXX XX 9626)

Student was a Chapter 33 recipient. School failed to maintain accurate, current and complete records of flight training hours. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
4-3-17/6-16-17	10 (7 RES + 3 dis)	\$31,121

The student's transcript reflects student was enrolled in the AAS Aviation Science-Helicopter degree program. The student's transcript reflects student was enrolled in four classes this period:

AVS210	4 credit hour (dis)
AVS210L	4 credit hours (dis)
AVS245	3 credit hours
CGS100	4 credit hours

AR04571

School catalog reflects the AVS210 is the Certified Flight Instructor (CFI) class, the AVS210L is the CFI lab class, and the AVS245 is the External Load Helicopter class. All three classes involve flight training. Multiple requests were made to the school to supply the flight training records for the students included in the survey. The flight training records provided by the school reflect training for the AVS210 & AVS210L from April 17, 2017, through May 31, 2017. No records were provided to substantiate training in these two classes beginning April 3, 2017, as certified. No training records were provided to substantiate any training for the AVS245 class. Benefits cannot be justified for any of these classes for the periods certified.

Evaluation: The school failed to maintain accurate and complete flight training records for all students. No or insufficient records involving the flight training provided by KCC were maintained by the school. Schools which have sought and obtained approval to provide training under Title 38, USC are required by law to maintain certain records and to make those records available for examination by authorized representatives of the government. These records must be maintained for at least three years following the termination of enrollment.

The facility accurately and promptly reported enrollment, tuition & fees, lessons serviced, flight training hours or APP/OJT hours. (38 CFR §21.4203(e)(f)(g), 21.4204, 21.7156, 21.9735)

Facts: In the case of D T Auten (XXX XX 2725).

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
3-28-16/6-19-16	14 (dis)	\$1,664

However, June 19, 2016, was a Sunday and the school has confirmed that no classes are held and no exams are given on Sunday. Additionally, the school calendar reflects term dates for the spring 2016 enrollment period was March 28, 2016, to June 10, 2016. The correct enrollment for this period (the enrollment which VA could potentially justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
3-28-16/6-10-16	14 (dis)	\$1,664

Facts: In the case of D T Auten (XXX XX 2725).

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

AR04572

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
6-20-16/9-25-16	13 (7 res + 6 dis)	\$27,183

A subsequent certification received by VA on August 29, 2016, reported a reduction of 3 (dis) hours to 10 hours (7 res + 3 dis) after drop/add period effective August 29, 2016, with punitive grades assigned with tuition and fees of \$26,777.50. A subsequent certification received by VA on December 13, 2016, reported a reduction of 7 (res) to 3 hours (dis) during drop/add period effective June 24, 2016, with tuition and fees of \$355.50.

The student's transcript reflects student was enrolled in the AAS Aviation Science-Helicopter degree program. The student's transcript reflects student was enrolled in four classes this period:

AVS120	3 credit hour (dis)
AVS200	5 credit hours
AVS200L	2 credit hours
PSY101	3 credit hours (dis)

School catalog reflects the AVS200 is the Instrument/Commercial Flight 1 Helicopter class and the AVS200L is the lab for this class. The Entrance requirements for this class states student should hold a private pilot license. However, the student transcript shows student failed Private Pilot Flight: Heli (AVS115) & Pro Pilot Ground (AVS110) during the winter 2016 term (which was not certified to VA because this term was prior to Ch33 date of election).

Per school policy the student should not have been enrolled in these seven credit hours nor certified to VA for these 7 hours due not meeting the entrance requirements at the beginning of this enrollment period. Additionally, the notices of reductions received by VA on August 29, 2016, and December 13, 2016, should not have been reported. Student transcript reflects student received punitive grades for 6 credit hours (dis) at the end of this term. Further, the student account record shows student was charged \$50 for a course fee for AVS120. The list of fees for the school does not include this fee and should not have been charged to student or certified to VA. Finally, September 25, 2016, was a Sunday and the school has confirmed that no classes are held and no exams are given on Sunday. The school calendar reflects term dates for the summer 2016 enrollment period was June 20, 2016, to August 19, 2016.

The correct enrollment for this period (the enrollment which VA could potentially justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
6-20-16/8-19-16	6 (dis)	\$716

Facts: In the case of J L Bende (XXX XX 0622),

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
4-3-17/6-16-17	12 (4 res + 8 dis)	\$19,769.04

A subsequent certification corrected the tuition and fee amount to \$19,796.04 effective April 17, 2017. However, documents from the school reflect the correct effective date was April 3, 2017.

Facts: In the case of J K Binni (XXX XX 1159),

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-28-15/1-3-16	15 (7 res + 8 dis)	\$26,885

VA records reflect benefits were paid based on this certification. However, the school calendar reflects the end date for this period was December 11, 2015, not January 3, 2016. The correct enrollment for this period (the enrollment which VA could potentially justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-28-15/12-11-15	8 (dis)	\$993

Facts: In the case of J K Binni (XXX XX 1159),

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
1-4-16/3-27-16	14 (7 res + 7 dis)	\$27,151.50

VA records reflect benefits were paid based on this certification. However, the school calendar reflects the end date for this period was March 18, 2016, not March 27, 2016. The correct enrollment for this period (the enrollment which VA could potentially justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
1-4-16/3-18-16	14 (7 res + 7 dis)	\$27,151.50

Facts: In the case of J K Binni (XXX XX 1159),

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
3-28-16/6-19-16	16 (10 res + 6 dis)	\$37,181

VA records reflect benefits were paid based on this certification. However, the school calendar reflects the end date for this period was June 10, 2016, not June 19, 2016. The correct enrollment for this period (the enrollment which VA could potentially justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
3-28-16/6-10-16	16 (10 res + 6 dis)	\$37,181

Facts: In the case of J K Binni (XXX XX 1159),

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
6-20-16/9-25-16	13 (dis)	\$1,645.50

VA records reflect benefits were paid based on this certification. However, the school calendar reflects the end date for this period was August 19, 2016, not September 25, 2016. The correct enrollment for this period (the enrollment which VA could potentially justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
6-20-16/8-19-16	13 (dis)	\$1,645.50

Facts: In the case of J L Butle (XXX XX 9998),

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the Associate of General Studies degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
1-4-16/3-18-16	15 (11 res + 5 r/d)	\$1,535

A Notice of Change in Student Status form (VA Form 22-1999b) was subsequently received by VA, reporting a reduction to 8 (res) hours after drop/add period effective March 18, 2016, with punitive grades assigned with tuition and fees of \$821. However, the student's transcript reflects student received punitive grades for all 15 credit hours. No reduction should have been reported to VA. No adjudicative action is necessary to correct as no debts were created.

Facts: In the case of R M Calki (XXX XX 5972).

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-28-15/1-3-16	15 (7 res + 8 dis)	\$26,885

VA records reflect benefits were paid based on this certification. However, the school calendar reflects the end date for this period was December 11, 2015, not January 3, 2016. The correct enrollment for this period (the enrollment which VA could potentially justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-28-15/12-11-15	8 (dis)	\$998

Facts: In the case of R M Calki (XXX XX 5972).

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
1-4-16/3-27-16	8 (dis)	\$953

VA records reflect benefits were paid based on this certification. However, the school calendar reflects the end date for this period was March 18, 2016, not March 27, 2016. The correct enrollment for this period (the enrollment which VA could potentially justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
1-4-16/3-18-16	8 (dis)	\$953

Facts: In the case of R M Calki (XXX XX 5972).

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
3-28-16/6-19-16	7 (res)	\$834.50

AR04576

VA records reflect benefits were paid based on this certification. However, the school calendar reflects the end date for this period was June 10, 2016, not June 19, 2016. The correct enrollment for this period (the enrollment which VA could potentially justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
3-28-16/6-10-16	7 (res)	\$834.50

Facts: In the case of R M Calki (XXX XX 5972),

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
6-20-16/9-25-16	7 (res)	\$26,422

VA records reflect benefits were paid based on this certification. However, the school calendar reflects the end date for this period was August 19, 2016, not September 25, 2016. The correct enrollment for this period (the enrollment which VA could potentially justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
6-20-16/8-19-16	7 (res)	\$26,422

Facts: In the case of R M Calki (XXX XX 5972),

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-26-16/1-6-17	3 (dis)	\$410.50

VA records reflect benefits were paid based on this certification. However, the school calendar reflects the end date for this period was December 9, 2016, not January 6, 2017. The correct enrollment for this period (the enrollment which VA could potentially justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-26-16/12-9-16	3 (dis)	\$410.50

AR04577

Facts: In the case of J W Cowan (XXX XX 5097).

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
1-5-15/3-29-15	15 (7 res + 8 dis)	\$25,295

VA records reflect benefits were paid based on this certification. However, the school calendar reflects the end date for this period was March 20, 2015, not March 29, 2015. The correct enrollment for this period (the enrollment which VA could potentially justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
1-5-15/3-20-15	15 (7 res + 8 dis)	\$25,295

Facts: In the case of J W Cowan (XXX XX 5097).

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
6-21-15/9-27-15	7 (dis)	\$834.50

A subsequent certification received by VA on July 7, 2015, reported an increase on first day of term to 8 hours (1 res + 7 dis) with tuition and fees of \$10,186.50. VA records reflect benefits were paid based on this certification. However, the school calendar reflects the dates for this enrollment period were June 22, 2015, through August 21, 2015. The correct enrollment for this period (the enrollment which VA could potentially justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
6-22-15/8-21-15	8 (1 res + 7 dis)	\$10,186.50

Facts: In the case of J W Cowan (XXX XX 5097).

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
6-21-15/9-27-15	7 (dis)	\$834.50

AR04578

A subsequent certification received by VA on July 7, 2015, reported an increase on first day of term to 8 hours (1 res + 7 dis) with tuition and fees of \$10,186.50. VA records reflect benefits were paid based on this certification. The student's transcript reflects student was enrolled in the AAS Aviation Science-Helicopter degree program. The student's transcript reflects student was enrolled in three classes this period:

AVS125	3 credit hour (dis)
AVS155	4 credit hours (dis)
AVS299	1 credit hours

The school catalog reflects that the degree plan for this program lists the AVS299 class (Special Studies: Aviation Science) as an elective class. The flight training records provided by the school reflect student was training in a Part 141 private pilot training program during this period. Documentation provided by the school reflects that the flight training for the AVS299 course involved contracted private pilot training and should not have been included in the certification of hours to VA. However, VA guidance on this issue instructs no adjudicative action is necessary for enrollments prior to December 31, 2015.

Facts: In the case of J W Cowan (XXX XX 5097).

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-28-15/1-3-16	8 (1 res + 7 dis)	\$3,786

However, the school calendar reflects the dates for this enrollment period were September 28, 2015, through December 11, 2015. The correct enrollment for this period (the enrollment which VA could potentially justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-28-15/12-11-15	8 (1 res + 7 dis)	\$3,786

Facts: In the case of J W Cowan (XXX XX 5097).

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
1-4-16/3-27-16	13 (dis)	\$1,545.50

However, the school calendar reflects the dates for this enrollment period were January 4, 2016, through March 18, 2016. The correct enrollment for this period (the enrollment which VA could potentially justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
1-4-16/3-18-16	13 (dis)	\$1,545.50

Facts: In the case of R M Duren (XXX XX 2708).

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. Enrollment Certifications (VA Form 22-1999) received by VA, reported student was enrolled in the Associate of Arts (Oregon Block Transfer) degree program for the following terms:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
6-21-15/8-21-15	7 (3 res + 4 dis)	\$785
9-28-15/12-18-15	12 (3 res + 5 dis + 4 r/d)	\$1,316.50

However, based on the school calendar the correct enrollment which should have been certified to VA was as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
6-22-15/8-21-15	7 (3 res + 4 dis)	\$785
9-28-15/12-11-15	12 (3 res + 5 dis + 4 r/d)	\$1,316.50

Facts: In the case of R B Flowe (XXX XX 3328)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-29-14/12-13-14	1 (res)	\$2,701

VA records reflect benefits were paid based on this certification. The student's transcript reflects student was enrolled in the AAS Aviation Science-Helicopter degree program and was enrolled in one single credit hour class this period:

AVS299 credit hour

The school catalog reflects that the degree plan for this program lists the AVS299 class (Special Studies: Aviation Science) as an elective class. The records provided by the school reflect student was training in a Part 141 private pilot training program during this period. Documentation provided by the school reflects that the flight training for the AVS299 course involved contracted private pilot training and should not have been included in the certification of hours to VA. However, VA guidance on this issue instructs no adjudicative action is necessary for enrollments prior to December 31, 2015.

Facts: In the case of R B Flowe (XXX XX 3328)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment and tuition and fees. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-29-14/12-13-14	1 (res)	\$2,701

VA records reflect benefits were paid based on this certification. The student's transcript reflects student was enrolled in the AAS Aviation Science-Helicopter degree program and was enrolled in one single credit hour class this period:

AVS299 credit hour

However, the financial documents received from the school reflect the student was charged and VA was certified for a total of three credit hours for this period. School documentation reflects the following charges this period:

Matriculation fee	\$40
Course fee AVS299	\$2350
Facility fee \$6 per credit	\$18.00
Student gov fee \$2.50 per credit	\$7.50
Technology fee \$4 per credit	\$12.00
Tuition \$89.50 per credit hour	\$268.50
Student ID fee \$5 per term	\$5.00
Total	\$2,701

The correct amount of tuition and fees for this period based on the school list of tuition and fees were as follows:

Matriculation fee	\$40
Course fee AVS299	\$2350
Facility fee \$6 per credit	\$6.00
Student gov fee \$2.50 per credit	\$2.50
Technology fee \$4 per credit	\$4.00
Tuition \$89.50 per credit hour	\$89.50
Student ID fee \$5 per term	\$5.00
Total	\$2,497

Additionally, the school calendar reflects the end date for this period was December 12, 2014, not December 13, 2014. The correct enrollment for this period (the enrollment which VA could potentially justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-29-14/12-12-14	1 (res)	\$2,497

Facts: In the case of R B Flowe (XXX XX 3328)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. The Enrollment Certifications (VA Form 22-1999) received by VA, reported student was enrolled in AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
1-5-15/3-29-15	11 (7 res + 4 dis)	\$18,663

A subsequent certification received by VA reported a reduction of 7 (res) hours to 4 hours (dis) after drop/add period effective March 29, 2015, with punitive grades assigned with tuition and fees of \$474. VA records reflect benefits were paid based on this certification. However, the school calendar reflects the end date for this period was March 20, 2015, not March 29, 2015. The initial enrollment for this period should have been certified to VA with an end date of March 20, 2015.

Facts: In the case of R B Flowe (XXX XX 3328)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. The Enrollment Certifications (VA Form 22-1999) received by VA, reported student was enrolled in AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
1-5-15/3-29-15	11 (7 res + 4 dis)	\$18,663

A subsequent certification received by VA reported a reduction of 7 (res) hours to 4 hours (dis) after drop/add period effective March 29, 2015, with punitive grades assigned with tuition and fees of \$474. This reduction was not necessary to report as student received punitive grades at end of term.

Facts: In the case of R B Flowe (XXX XX 3328)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. The Enrollment Certifications (VA Form 22-1999) received by VA, reported student was enrolled in AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
6-21-15/9-27-15	14 (10 res + 4 dis)	\$33,085

A subsequent certification received by VA reported a reduction to 4 hours (dis) effective first day of term on June 21, 2015, with tuition and fees of \$474. VA records reflect benefits were paid based on this certification. However, the school calendar reflects the dates for this enrollment period was from June 22, 2015, through August 21, 2015. The initial certification for this enrollment period should have been reported with a beginning date of June 22, 2015, and an end date of August 21, 2015.

AR04582

Facts: In the case of R B Flowe (XXX XX 3328)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. The Enrollment Certifications (VA Form 22-1999) received by VA, reported student was enrolled in AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-28-15/1-3-16	3 (res)	\$306

VA records reflect benefits were paid based on this certification. However, the school calendar reflects the end date for this enrollment period was December 11, 2015, not January 3, 2016.

Facts: In the case of S R Gayle (XXX XX 7004)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
1-5-15/3-29-15	15 (7 res + 8 dis)	\$25,255

VA records reflect benefits were paid based on this certification. However, the school calendar reflects the end date for this period was March 20, 2015, not March 29, 2015. The correct enrollment for this period (the enrollment which VA could potentially justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
1-5-15/3-20-15	15 (7 res + 8 dis)	\$25,295

Facts: In the case of S R Gayle (XXX XX 7004)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
6-21-15/9-27-15	4 (dis)	\$479

A subsequent certification received by VA reported an increase on first day of term to 5 hours (1 res + 4 dis) with tuition and fees of \$9,831. VA records reflect benefits were paid based on this certification. However, the school calendar reflects the dates for this enrollment period were June 22, 2015, through August 21, 2015. The correct enrollment for this period (the enrollment which VA could potentially justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
6-22-15/8-21-15	5 (1 res + 4 dis)	\$9,831

Facts: In the case of S R Gayle (XXX XX 7004)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
6-21-15/9-27-15	4 (dis)	\$479

A subsequent certification received by VA reported an increase on first day of term to 5 hours (1 res + 4 dis) with tuition and fees of \$9,831. VA records reflect benefits were paid based on this certification. The student's transcript reflects student was enrolled in the AAS Aviation Science-Helicopter degree program. The student's transcript reflects student was enrolled in three classes this period:

AVS252	4 credit hour (dis)
AVS299	1 credit hours

The school calendar reflects the actual dates for this enrollment period were June 22, 2015, through August 21, 2015. The school catalog reflects that the degree plan for this program lists the AVS299 class (Special Studies: Aviation Science) as an elective class. The flight training records provided by the school reflect student was training in a Part 141 private pilot training program during this period. Documentation provided by the school reflects that the flight training for the AVS299 course involved contracted private pilot training and should not have been included in the certification of hours to VA. However, VA guidance on this issue instructs no adjudicative action is necessary for enrollments prior to December 31, 2015.

Facts: In the case of S R Gayle (XXX XX 7004)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-28-15/1-3-16	15 (11 res + 4 dis)	\$1,601

However, the school calendar reflects the dates for this enrollment period were September 28, 2015, through December 11, 2015. The correct enrollment for this period (the enrollment which VA could potentially justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-28-15/12-11-15	15 (11 res + 4 dis)	\$1,601

AR04584

Facts: In the case of S R Gayle (XXX XX 7004)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
1-4-16/3-27-16	14 (res)	\$36,878

However, the school calendar reflects the dates for this enrollment period were January 4, 2016, through March 18, 2016. The correct enrollment for this period (the enrollment which VA could potentially justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
1-4-16/3-18-16	14 (res)	\$36,878

Facts: In the case of S R Gayle (XXX XX 7004)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
3-28-16/6-19-16	13 (dis)	\$1,545.50

However, the school calendar reflects the dates for this enrollment period were March 28, 2016, to June 10, 2016. The correct enrollment for this period (the enrollment which VA could potentially justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
3-28-16/6-10-16	13 (dis)	\$1,545.50

Facts: In the case of S R Gayle (XXX XX 7004)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-26-16/1-6-17	11 (7 res + 4 dis)	\$27,898

However, the school calendar reflects the dates for this enrollment period were September 26, 2016, to December 9, 2016. The correct enrollment for this period (the enrollment which VA could potentially justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-26-16/12-9-16	11 (7 res + 4 dis)	\$27,898

Facts: In the case of A C Grant (XXX XX 0942)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in AAS Aviation Science Helicopter degree program for the following terms:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
1-4-16/3-27-16	7 (res)	\$13,489

The student's transcripts reflects enrollment in the AAS Aviation Science Airplane degree program, not in the Helicopter program. VA records reflect benefits were paid based on this certification. However, the school calendar reflects the end date for this period was March 18, 2016, not March 27, 2016. The correct enrollment for this period (the enrollment which VA could potentially justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
1-4-16/3-18-16	7 (res)	\$13,489

Facts: In the case of N C Harri (XXX XX 0704)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
6-21-15/9-27-15	11 (7 res + 4 dis)	\$13,793

VA records reflect benefits were paid based on this certification. However, the school calendar reflects the dates for this period were June 22, 2015, through August 21, 2015. The correct enrollment for this period (the enrollment which VA could potentially justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
6-22-15/8-21-15	4 (dis)	\$519

Facts: In the case of N C Harri (XXX XX 0704)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. A Notice of Change in Student Status form (VA Form 22-1999b) was received by VA reporting a reduction from 11 hours (7 res + 4 dis) to 7 hours (res) after drop period with punitive grades assigned effective September 27, 2015. However, the student transcript reflects student received punitive grades for all eleven hours this period. No reduction was necessary to report.

AR04586

Facts: In the case of N C Harri (XXX XX 0704)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-28-15/1-3-16	3 (dis)	\$355.50

VA records reflect benefits were paid based on this certification. The student's transcript reflects student was actually enrolled in the AAS Aviation Science-Airplane degree program. Additionally, the student's transcript reflects student was enrolled in two classes this period for a total of 7 credit hours:

AVS125	3 credit hour (dis)
AVS155	4 credit hours (dis)

Documentation provided by the school reflects that the credit hours associated with the AVS155 class were not included in the certification to VA because it was a repeat class. However, the student previously completed the class with an "F" grade and therefore VA could potentially pay benefits for this class during this enrollment period. Additionally, the school calendar reflects the end date for this period was December 11, 2015. The correct enrollment for this period (the enrollment which VA could potentially justify benefits) was as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-28-15/12-11-15	7 (dis)	\$834.50

Facts: In the case of N C Harri (XXX XX 0704)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
1-4-16/3-27-16	10 (dis)	\$1,190

However, the school calendar reflects the dates for this enrollment period were January 4, 2016, through March 18, 2016. The correct enrollment for this period (the enrollment which VA could potentially justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
1-4-16/3-18-16	10 (dis)	\$1,190

Facts: In the case of N C Harri (XXX XX 0704)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
3-28-16/6-19-16	7 (dis)	\$834.50

However, the school calendar reflects term dates for the spring 2016 enrollment period was March 28, 2016, to June 10, 2016. The correct enrollment for this period (the enrollment which VA could potentially justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
3-28-16/6-10-16	7 (dis)	\$834.50

Facts: In the case of N C Harri (XXX XX 0704)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
6-20-16/9-25-16	7 (1 res + 6 dis)	\$5,968

However, the school calendar reflects term dates for the summer 2016 enrollment period was June 20, 2016, to August 19, 2016. The correct enrollment for this period (the enrollment which VA could potentially justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
6-20-16/8-19-16	7 (1 res + 6 dis)	\$5,968

Facts: In the case of N C Harri (XXX XX 0704)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
6-20-16/9-25-16	7 (1 res + 6 dis)	\$5,968

Subsequently, a Notice of Change in Student Status form (VA Form 22-1999b) was received by VA reporting a withdrawal before beginning of term effective June 19, 2016. However, the student transcript reflects receipt of a punitive grade for a one credit hour class this period. It was in error to report a complete withdrawal this period. No report of withdrawal was necessary.

Facts: In the case of N C Harri (XXX XX 0704)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
6-20-16/8-19-16	7 (1 res + 6 dis)	\$5,968

VA records reflect benefits were paid based on this certification. The student's transcript reflects student was enrolled in the AAS Aviation Science-Airplane degree program and completed one single credit hour class this period:

AVS299 credit hour

The school catalog reflects that the degree plan for this program lists the AVS299 class (Special Studies: Aviation Science) as an elective class. The records provided by the school reflect student was training in a Part 141 private pilot training program during this period. Documentation provided by the school reflects that the flight training for the AVS299 course involved contracted private pilot training and should not have been included in the certification of hours to VA.

Facts: In the case of L A Hipk (XXX XX 5814)

Student was a Chapter 35 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the Associate of General Studies degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
3-30-15/6-12-15	.30 (r/d)	\$355.50

A Notice of Change in Student Status form (VA Form 22-1999b) received by VA reported an increase in credit hours effective April 7, 2015, as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
3-30-15/6-12-15	3 (r/d)	\$355.50

However, student transcript reflects enrollment in one class; WRI095. School records show this was a remedial class conducted online which is not certifiable to VA. No enrollment should have been certified to VA for this period.

AR04589

Facts: In the case of L A Hipsk (XXX XX 5814),

Student was a Chapter 35 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the Associate of General Studies degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
6-21-15/8-21-15	8 (dis)	N/A

This term was reported in error. The student transcript reflects no enrollment this period. Student never attended this term. No enrollment should have been certified to VA for this period.

Facts: In the case of R W Jones (XXX XX 0124)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-26-16/1-6-17	15 (8 res + 7 dis)	\$32,524.50

VA records reflect benefits were paid based on this certification. However, the school calendar reflects the end date for this period was December 9, 2016, not January 6, 2017. The correct enrollment for this period (the enrollment which VA could potentially justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-26-16/12-9-16	15 (8 res + 7 dis)	\$32,524.50

Facts: In the case of K E Kauff (XXX XX 9285)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
6-21-15/9-27-15	15 (7 res+8 dis)	\$1,662

VA records reflect benefits were paid based on this certification. However, the school calendar reflects the dates for this enrollment period were June 22, 2015, through August 21, 2015. The correct enrollment for this period (the enrollment which VA could potentially justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
6-22-15/8-21-15	8 (dis)	\$953

Facts: In the case of K E Kauff (XXX XX 9285)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-28-15/1-3-16	18 (14 res+4 dis)	\$34,932

VA records reflect benefits were paid based on this certification. However, the school calendar reflects the dates for this enrollment period were September 28, 2015, through December 11, 2015. The correct enrollment for this period (the enrollment which VA could potentially justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-28-15/12-11-15	18 (14 res+4 dis)	\$34,932

Facts: In the case of K E Kauff (XXX XX 9285)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-28-15/1-3-16	18 (14 res+4 dis)	\$34,932

VA records reflect benefits were paid based on this certification. The student's transcript reflects student was enrolled in the AAS Aviation Science-Helicopter degree program. The student's transcript reflects student was enrolled in five classes this period:

AVS150	4 credit hour (dis)
AVS200	5 credit hours
AVS200L	2 credit hours
AVS299	1 credit hours
MTH060	4 credit hours

The school catalog reflects that the degree plan for this program lists the AVS299 class (Special Studies: Aviation Science) as an elective class. Documentation provided by the school reflects that the flight training for the AVS299 course involved contracted private pilot training and should not have been included in the certification of hours to VA. However, VA guidance on this issue instructs no adjudicative action is necessary for enrollments prior to December 31, 2015.

AR04591

Facts: In the case of K E Kauff (XXX XX 9285)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
1-4-16/3-27-16	14 (res)	\$36,878

VA records reflect benefits were paid based on this certification. However, the school calendar reflects the dates for this enrollment period were January 4, 2016, through March 18, 2016. The correct enrollment for this period (the enrollment which VA could potentially justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
1-4-16/3-18-16	14 (res)	\$36,878

Facts: In the case of K E Kauff (XXX XX 9285)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
3-28-16/6-19-16	12 (5 res+7 dis)	\$18,079.50

VA records reflect benefits were paid based on this certification. However, the school calendar reflects the dates for this enrollment period were March 28, 2016, through June 10, 2016. The correct enrollment for this period (the enrollment which VA could potentially justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
3-28-16/6-10-16	12 (5 res+7 dis)	\$18,079.50

Facts: In the case of K E Kauff (XXX XX 9285)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
6-20-16/9-25-16	14 (11 res+3 dis)	\$26,498.50

AR04592

VA records reflect benefits were paid based on this certification. However, the school calendar reflects the dates for this enrollment period were June 20, 2016, through August 19, 2016. The correct enrollment for this period (the enrollment which VA could potentially justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
6-20-16/8-19-16	14 (11 res+3 dis)	\$26,498.50

Facts: In the case of K E Kauff (XXX XX 9285)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-26-16/1-6-17	12 (8 res+4 dis)	\$1,345

VA records reflect benefits were paid based on this certification. However, the school calendar reflects the dates for this enrollment period were September 26, 2016, through December 9, 2016. The correct enrollment for this period (the enrollment which VA could potentially justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-26-16/12-9-16	12 (8 res+4 dis)	\$1,345

Facts: In the case of W E King (XXX XX 3510)

Student was a Chapter 35 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the Associate of General Studies degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
1-6-14/3-21-14	4 (res)	\$332

The student's transcript reflects student was enrolled in the MTH095 class this period. MTH095 is a remedial/deficiency class. The school should have reported this term as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
1-6-14/3-21-14	4 (r/d)	\$332

AR04593

Facts: In the case of W E King (XXX XX 3510).

Student was a Chapter 35 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the Associate of General Studies degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
3-31-14/6-13-14	3 (res)	\$291.50

The student's transcript reflects student was enrolled in the WRI095 class this period. WRI095 is a remedial/deficiency class. The school should have reported this term as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
3-31-14/6-13-14	3 (r/d)	\$291.50

Facts: In the case of W E King (XXX XX 3510).

Student was a Chapter 35 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the Associate of General Studies degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-28-15/12-18-15	12 (res)	\$1,674

VA records reflect claimant was paid Ch35 benefits at the full time rate for this period. The student's transcript reflects student was enrolled in AMT101 and AMT110. The schedule for these classes reflects pursuit during the following dates:

<u>Class</u>	<u>Hours</u>	<u>Begin date</u>	<u>End date</u>
AMT101	4	9-28-15	10-29-15
AMT110	8	10-30-15	12-7-15

The school should have reported this term as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-28-15/10-29-15	4 (res)	\$438
10-30-15/12-7-15	8 (res)	\$1241

Based on this accurate reporting the claimant should have been paid at the following training times for these periods:

<u>Enrollment dates</u>	<u>Training time</u>
9-28-15/10-29-15	$\frac{3}{4}$ time rate
10-30-15/12-7-15	full time rate

Facts: In the case of W E King (XXX XX 3510),

Student was a Chapter 35 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the Associate of General Studies degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
1-4-16/3-18-16	10 (res)	\$1,450

VA records reflect claimant was paid Ch35 benefits at the three-quarter time rate for this period. Transcript & school documents show student was pursuing the AASAT Automotive Technology program not AGS. The student's transcript reflects student was enrolled in AMT270 and AMT275. The schedule for these classes reflects pursuit during the following dates:

<u>Class</u>	<u>Hours</u>	<u>Begin date</u>	<u>End date</u>
AMT270	5	1-4-16	2-8-16
AMT275	5	2-9-16	3-15-16

The school should have reported this term as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
1-4-16/2-8-16	5 (res)	\$715
2-9-16/3-15-16	5 (res)	\$735

Based on this accurate reporting the claimant should have been paid at the following training times for these periods:

<u>Enrollment dates</u>	<u>Training time</u>
1-4-16/2-8-16	full time rate
2-9-16/3-15-16	full time rate

Facts: In the case of W E King (XXX XX 3510),

Student was a Chapter 35 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the Associate of General Studies degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
6-20-16/8-19-16	10 (res)	N/A

AR04595

VA records reflect claimant was paid Ch35 benefits at the full time rate for this period. Transcript & school documents show student was pursuing the AASAT Automotive Technology program not AGS. The student's transcript reflects student was enrolled in AMT115 and AMT130. The schedule for these classes reflects pursuit during the following dates:

<u>Class</u>	<u>Hours</u>	<u>Begin date</u>	<u>End date</u>
AMT115	5	6-20-16	7-15-16
AMT130	5	7-18-16	8-11-16

The school should have reported this term as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
6-20-16/7-15-16	5 (res)	N/A
7-18-16/8-11-16	5 (res)	N/A

Based on this accurate reporting the claimant should have been paid at the following training times for these periods:

<u>Enrollment dates</u>	<u>Training time</u>
6-20-16/7-15-16	full time rate
7-18-16/8-11-16	full time rate

Facts: In the case of W E King (XXX XX 3510),

Student was a Chapter 35 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the Associate of General Studies degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-26-16/12-9-16	13 (res)	N/A

VA records reflect claimant was paid Ch35 benefits at the full time rate for this period. Transcript & school documents show student was pursuing the AASAT Automotive Technology program not AGS. The student's transcript reflects student was enrolled in AMT143, AMT145 and SPE111. The schedule for these classes reflects pursuit during the following dates:

<u>Class</u>	<u>Hours</u>	<u>Begin date</u>	<u>End date</u>
AMT143	5	9-26-16	10-21-16
AMT145	5	10-24-16	12-9-16
SPE111	3	9-26-16	12-9-16

The school should have reported this term as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-26-16/10-21-16	5 (res)	N/A
10-24-16/12-9-16	5 (res)	N/A
9-26-16/12-9-16	3 (res)	\$306

Based on this accurate reporting the claimant should have been paid at the following training times for these periods:

<u>Enrollment dates</u>	<u>Training time</u>
9-26-16/10-21-16	full time rate
10-22-16/10-23-16	¼ time rate (tuition and fees only)
10-24-16/12-9-16	full time

Facts: In the case of W E King (XXX XX 3510).

Student was a Chapter 35 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the Associate of General Studies degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
1-9-17/3-24-17	10 (res)	N/A

VA records reflect claimant was paid Ch35 benefits at the three-quarter time rate for this period. Transcript & school documents show student was pursuing the AASAT Automotive Technology program not AGS. The student's transcript reflects student was enrolled in AMT250 and AMT260. The schedule for these classes reflects pursuit during the following dates:

<u>Class</u>	<u>Hours</u>	<u>Begin date</u>	<u>End date</u>
AMT250	5	1-9-17	2-10-17
AMT260	5	2-20-17	3-17-17

The school should have reported this term as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
1-9-17/2-10-17	5 (res)	N/A
2-20-17/3-17-17	5 (res)	N/A

Based on this accurate reporting the claimant should have been paid at the following training times for these periods:

<u>Enrollment dates</u>	<u>Training time</u>
1-9-17/2-10-17	full time rate
2-20-17/3-17-17	full time rate

Facts: In the case of D W Larim (XXX XX 4893)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
1-5-15/3-29-15	15 (7 res + 8 dis)	\$25,255

VA records reflect benefits were paid based on this certification. However, the school calendar reflects the end date for this period was March 20, 2015, not March 29, 2015. The correct enrollment for this period (the enrollment which VA could potentially justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
1-5-15/3-20-15	15 (7 res + 8 dis)	\$25,255

Facts: In the case of D W Larim (XXX XX 4893)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
6-21-15/9-27-15	8 (4 dis + 4 r/d)	\$887

A subsequent certification received by VA on July 7, 2015, reported an increase on first day of term to 9 hours (1 res + 4 dis + 4 r/d) with tuition and fees of \$10,239. VA records reflect benefits were paid based on this certification. However, the school calendar reflects the dates for this enrollment period were June 22, 2015, through August 21, 2015. The correct enrollment for this period (the enrollment which VA could potentially justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
6-22-15/8-21-15	9 (1 res + 4 dis + 4 r/d)	\$10,239

Facts: In the case of D W Larim (XXX XX 4893)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
6-21-15/9-27-15	8 (4 dis + 4 r/d)	\$887

A subsequent certification received by VA on July 7, 2015, reported an increase on first day of term to 9 hours (1 res + 4 dis + 4 r/d) with tuition and fees of \$10,239. VA records reflect benefits were paid based on this certification. The student's transcript reflects student was enrolled in the AAS Aviation Science-Helicopter degree program. The student's transcript reflects student was enrolled in three classes this period:

AVS155	4 credit hour (dis)
AVS299	1 credit hour
WRI095	4 credit hours

The school catalog reflects that the degree plan for this program lists the AVS299 class (Special Studies: Aviation Science) as an elective class. The flight training records provided by the school reflect student was training in a Part 141 private pilot training program during this period. Documentation provided by the school reflects that the flight training for the AVS299 course involved contracted private pilot training and should not have been included in the certification of hours to VA. However, VA guidance on this issue instructs no adjudicative action is necessary for enrollments prior to December 31, 2015.

Facts: In the case of D W Larim (XXX XX 4893)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-28-15/1-3-16	7 (res)	\$719

However, the school calendar reflects the dates for this enrollment period were September 28, 2015, through December 11, 2015. The correct enrollment for this period (the enrollment which VA could potentially justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-28-15/12-11-15	7 (res)	\$719

Facts: In the case of D W Larim (XXX XX 4893)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
1-4-16/3-27-16	11 (4 res + 7 dis)	\$1,242.20

AR04599

However, the school calendar reflects the dates for this enrollment period were January 4, 2016, through March 18, 2016. The correct enrollment for this period (the enrollment which VA could potentially justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
1-4-16/3-18-16	11 (4 res + 7 dis)	\$1,242.20

Facts: In the case of D W Larim (XXX XX 4893)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
3-28-16/6-19-16	13 (10 res + 3 dis)	\$36,825.50

VA records reflect benefits were paid based on this certification. However, the school calendar reflects the end date for this period was June 10, 2016, not June 19, 2016. The correct enrollment for this period (the enrollment which VA could potentially justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
3-28-16/6-10-16	13 (10 res + 3 dis)	\$36,825.50

Facts: In the case of D W Larim (XXX XX 4893)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
6-20-16/9-25-16	10 (3 res + 7 dis)	\$1,240.50

VA records reflect benefits were paid based on this certification. However, the school calendar reflects the end date for this period was August 19, 2016, not September 25, 2016. The correct enrollment for this period (the enrollment which VA could potentially justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
6-20-16/8-19-16	10 (3 res + 7 dis)	\$1,240.50

Facts: In the case of D W Larim (XXX XX 4893)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-26-16/1-6-17	7 (3 dis + 4 r/d)	\$818.50

VA records reflect benefits were paid based on this certification. However, the school calendar reflects the end date for this period was December 9, 2016, not January 6, 2017. The correct enrollment for this period (the enrollment which VA could potentially justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-26-16/12-9-16	7 (3 dis + 4 r/d)	\$818.50

Facts: In the case of N L Lawso (XXX XX 7037)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Airplane degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
6-21-15/9-27-15	8 (dis)	\$953

VA records reflect benefits were paid based on this certification. However, the school calendar reflects the enrollment dates for this period was June 22, 2015, through August 21, 2015. The correct enrollment for this period (the enrollment which VA could potentially justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
6-22-15/8-21-15	8 (dis)	\$953

Facts: In the case of N L Lawso (XXX XX 7037)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Airplane degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-28-15/1-3-16	6 (dis)	\$716

VA records reflect benefits were paid based on this certification. However, the school calendar reflects the enrollment dates for this period was September 28, 2015, through December 11, 2015. The correct enrollment for this period (the enrollment which VA could potentially justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-28-15/12-11-15	6 (dis)	\$716

AR04601

Facts: In the case of N L Lawso (XXX XX 7037)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Airplane degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
3-28-16/6-19-16	12 (res)	\$32,119

VA records reflect benefits were paid based on this certification. However, the school calendar reflects the enrollment dates for this period was March 28, 2016, through June 10, 2016. The correct enrollment for this period (the enrollment which VA could potentially justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
3-28-16/6-10-16	12 (res)	\$32,119

Facts: In the case of N L Lawso (XXX XX 7037)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Airplane degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
6-20-16/9-25-16	7 (dis)	\$934.50

VA records reflect benefits were paid based on this certification. However, the school calendar reflects the enrollment dates for this period was June 20, 2016, through August 19, 2016. The correct enrollment for this period (the enrollment which VA could potentially justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
6-20-16/8-19-16	7 (dis)	\$934.50

Facts: In the case of J M Louis (XXX XX 3907)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
1-5-15/3-29-15	15 (7 res + 8 dis)	\$25,295

AR04602

VA records reflect benefits were paid based on this certification. However, the school calendar reflects the end date for this period was March 20, 2015, not March 29, 2015. The correct enrollment for this period (the enrollment which VA could potentially justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
1-5-15/3-20-15	15 (7 res + 8 dis)	\$25,295

Facts: In the case of J M Louis (XXX XX 3907)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. The Enrollment Certifications (VA Form 22-1999) received by VA, reported student was enrolled in AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
1-5-15/3-29-15	15 (7 res + 8 dis)	\$25,295

(The school calendar reflects the end date for this period was March 20, 2015, not March 29, 2015.) However, a subsequent certification received by VA reported a reduction of 7 (res) hours to 8 hours (dis) after drop/add period effective March 29, 2015, with punitive grades assigned with tuition and fees of \$993. This reduction was not necessary to report as student received punitive grades at end of term.

Facts: In the case of J M Louis (XXX XX 3907)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
6-21-15/9-27-15	9 (1 res + 8 dis)	\$10,305

VA records reflect benefits were paid based on this certification. However, the school calendar reflects the dates for this enrollment period were June 22, 2015, through August 21, 2015. The correct enrollment for this period (the enrollment which VA could potentially justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
6-22-15/8-21-15	9 (1 res + 8 dis)	\$10,305

Facts: In the case of J M Louis (XXX XX 3907)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
6-21-15/9-27-15	9 (1 res + 8 dis)	\$10,305

VA records reflect benefits were paid based on this certification. (The school calendar reflects the dates for this enrollment period were June 22, 2015, through August 21, 2015.) The student's transcript reflects student was enrolled in the AAS Aviation Science-Helicopter degree program. The student's transcript reflects student was enrolled in three classes this period:

AVS252	4 credit hour (dis)
AVS155	4 credit hours (dis)
AVS299	1 credit hour

The school catalog reflects that the degree plan for this program lists the AVS299 class (Special Studies: Aviation Science) as an elective class. The flight training records provided by the school reflect student was training in a Part 141 private pilot training program during this period. Documentation provided by the school reflects that the flight training for the AVS299 course involved contracted private pilot training and should not have been included in the certification of hours to VA. However, VA guidance on this issue instructs no adjudicative action is necessary for enrollments prior to December 31, 2015.

Facts: In the case of J M Louis (XXX XX 3907)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-28-15/1-3-16	7 (1 res + 6 dis)	\$3,668

However, the school calendar reflects the dates for this enrollment period were September 28, 2015, through December 11, 2015. The correct enrollment for this period (the enrollment which VA could potentially justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-28-15/12-11-15	7 (1 res + 6 dis)	\$3,668

Facts: In the case of J M Louis (XXX XX 3907)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
1-4-16/3-27-16	13 (dis)	\$1,545.50

AR04604

VA records reflect benefits were paid based on this certification. However, the school calendar reflects the end date for this period was March 18, 2016, not March 27, 2016. The correct enrollment for this period (the enrollment which VA could potentially justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
1-4-16/3-18-16	13 (dis)	\$1,545.50

Facts: In the case of J M Louis (XXX XX 3907)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. The Enrollment Certifications (VA Form 22-1999) received by VA, reported student was enrolled in AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
1-4-16/3-27-16	13 (dis)	\$1,545.50

(The school calendar reflects the end date for this period was March 18, 2016, not March 27, 2016.) However, a subsequent certification received by VA reported a reduction of 3 (dis) hours to 10 hours (dis) after drop/add period effective March 27, 2016, with punitive grades assigned with tuition and fees of \$1,190. This reduction was not necessary to report as student received punitive grades at end of term.

Facts: In the case of K L Luken (XXX XX 1613)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the Associate of Science degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
1-4-16/3-18-16	12 (8 res + 4 r/d)	\$1,289

A Notice of Change in Student Status form (VA Form 22-1999b) was subsequently received by VA, reporting a reduction to 4 (r/d) hours after drop/add period effective March 18, 2016, with punitive grades assigned with tuition and fees of \$413. However, the student's transcript reflects student received punitive grades for all 12 credit hours. No reduction should have been reported to VA. No adjudicative action is necessary to correct as no debts were created.

Facts: In the case of R A Lupke (XXX XX 6940)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-29-14/12-13-14	17 (res)	\$45,489

VA records reflect benefits were paid based on this certification. However, the school calendar reflects the end date for this period was December 12, 2014, not December 13, 2014. The correct enrollment for this period (the enrollment which A could potentially justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-29-14/12-12-14	17 (res)	\$45,489

Facts: In the case of R A Lupke (XXX XX 6940)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. The Enrollment Certifications (VA Form 22-1999) received by VA, reported student was enrolled in AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-29-14/12-13-14	17 (res)	\$45,489

A subsequent certification received by VA reported a reduction of 12 (res) hours to 5 hours (res) after drop/add period effective December 13, 2014, with punitive grades assigned with tuition and fees of \$510. This reduction was not necessary to report as student received punitive grades at end of term.

Facts: In the case of C E Mann (XXX XX 1395)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
6-21-15/9-27-15	4 (dis)	\$479

VA records reflect benefits were paid based on this certification. However, the school calendar reflects the dates for this enrollment period were June 22, 2015, through August 21, 2015. The correct enrollment for this period (the enrollment which VA could potentially justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
6-22-15/8-21-15	4 (dis)	\$479

Facts: In the case of C E Mann (XXX XX 1395)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-28-15/1-3-16	8 (res)	\$24,296

However, the school calendar reflects the dates for this enrollment period were September 28, 2015, through December 11, 2015. The correct enrollment for this period (the enrollment which VA could potentially justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-28-15/12-11-15	8 (res)	\$24,296

Facts: In the case of C R Marti (XXX XX 4862)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
1-5-15/3-29-15	15 (7 res + 8 dis)	\$25,255

VA records reflect benefits were paid based on this certification. However, the school calendar reflects the end date for this period was March 20, 2015, not March 29, 2015.

Facts: In the case of C R Marti (XXX XX 4862)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
6-21-15/9-27-15	8 (res)	\$821

VA records reflect benefits were paid based on this certification. However, the school calendar reflects the enrollment dates for this period was June 22, 2015, through August 21, 2015.

Facts: In the case of C R Marti (XXX XX 4862)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
6-21-15/9-27-15	8 (res)	\$821

AR04607

A subsequent certification received by VA on July 8, 2015, reported an increase on first day of term to 9 hours (res) with tuition and fees of \$10,168. VA records reflect benefits were paid based on this certification. The student's transcript reflects student was enrolled in the AAS Aviation Science-Helicopter degree program. The student's transcript reflects student was enrolled in three classes this period:

MTH070	4 credit hours
WRI121	4 credit hours
AVS299	1 credit hour

The school catalog reflects that the degree plan for this program lists the AVS299 class (Special Studies: Aviation Science) as an elective class. Documentation provided by the school reflects that the flight training for the AVS299 course involved contracted private pilot training and should not have been included in the certification of hours to VA. However, VA guidance on this issue instructs no adjudicative action is necessary for enrollments prior to December 31, 2015.

Facts: In the case of C R Marti (XXX XX 4862)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-28-15/1-3-16	7 (dis)	\$839.50

However, the school calendar reflects the dates for this enrollment period were September 28, 2015, through December 11, 2015. The correct enrollment for this period (the enrollment which VA could potentially justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-28-15/12-11-15	7 (dis)	\$839.50

Facts: In the case of C R Marti (XXX XX 4862)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
1-4-16/3-27-16	8 (4 res + 4 dis)	\$887

However, the school calendar reflects the dates for this enrollment period were January 4, 2016, through March 18, 2016. The correct enrollment for this period (the enrollment which VA could potentially justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
1-4-16/3-18-16	8 (4 res + 4 dis)	\$887

Facts: In the case of C R Marti (XXX XX 4862)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
3-28-16/6-19-16	9 (3 res + 6 dis)	\$1,022

However, the school calendar reflects term dates for the spring 2016 enrollment period were March 28, 2016, to June 10, 2016. The correct enrollment for this period (the enrollment which VA could potentially justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
3-28-16/6-10-16	9 (3 res + 6 dis)	\$1,022

Facts: In the case of J E Mayna (XXX XX 2299)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Criminal Justice degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
4-3-17/6-16-17	12 (6 res + 6 dis)	\$1,328

A Notice of Change in Student Status form (VA Form 22-1999b) was subsequently received by VA, reporting a reduction to 9 (3 res + 6 dis) hours after drop/add period effective June 16, 2017, with punitive grades assigned with tuition and fees of \$1,022. However, the student's transcript reflects student received incomplete or punitive grades for all 12 credit hours. No reduction should have been reported to VA. No adjudicative action is necessary to correct as no debts were created.

Facts: In the case of CR Montg (XXX XX 3574)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Airplane degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-28-15/1-3-16	7 (res)	\$16,415

AR04609

However, the school calendar reflects the dates for this enrollment period were September 28, 2015, through December 11, 2015. The correct enrollment for this period (the enrollment which VA could potentially justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-28-15/12-11-15	7 (res)	\$16,415

Facts: In the case of CR Montg (XXX XX 3574)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. The Enrollment Certifications (VA Form 22-1999) received by VA, reported student was enrolled in AAS Aviation Science Airplane degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-28-15/1-3-16	7 (res)	\$16,415

A subsequent certification received by VA reported student withdrew from all hours effective January 3, 2016, receiving punitive grades for all 7 credit hours. This withdrawal was not necessary to report as transcript reflects student received punitive grades for eleven credit hours at end of this term.

Facts: In the case of CR Montg (XXX XX 3574)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Airplane degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
1-4-16/3-27-16	12 (dis)	\$1,901

However, the school calendar reflects the dates for this enrollment period were January 4, 2016, through March 18, 2016. The correct enrollment for this period (the enrollment which VA could potentially justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
1-4-16/3-18-16	12 (dis)	\$1,901

Facts: In the case of CR Montg (XXX XX 3574)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Airplane degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
3-28-16/6-19-16	12 (dis)	\$1,427

AR04610

However, the school calendar reflects the dates for this enrollment period were March 28, 2016, to June 10, 2016. The correct enrollment for this period (the enrollment which VA could potentially justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
3-28-16/6-10-16	12 (dis)	\$1,427

Facts: In the case of CR Montg (XXX XX 3574)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. The Enrollment Certifications (VA Form 22-1999) received by VA, reported student was enrolled in AAS Aviation Science Airplane degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
3-28-16/6-19-16	12 (dis)	\$1,427

A subsequent certification received by VA reported student reduced from 12 credit hours (dis) to 9 credit hours (dis) effective June 10, 2016, receiving punitive grades for the 3 credit hours dropped. This reduction was not necessary to report as transcript reflects student received punitive grades for twelve credit hours at end of this term.

Facts: In the case of M J Nordi (XXX XX 2226)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-29-14/12-13-14	12 (8 dis + 4 r/d)	\$1,361

VA records reflect benefits were paid based on this certification. However, the school calendar reflects the end date for this period was December 12, 2014, not December 13, 2014. The correct enrollment for this period (the enrollment which VA could potentially justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-29-14/12-12-14	12 (8 dis + 4 r/d)	\$1,361

Facts: In the case of M J Nordi (XXX XX 2226)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
1-5-15/3-29-15	12 (8 dis + 4 r/d)	\$1,467

A subsequent certification received by VA on February 23, 2015, reported a reduction to 8 hours (4 dis + 4 r/d) after drop/add period with non-punitive grades effective on February 16, 2015, with tuition and fees of \$993. A subsequent certification received by VA on April 3, 2015, reported unsatisfactory progress effective March 20, 2015. VA records reflect benefits were paid based on these certifications. The student transcript reflects pursuit of three classes this period:

AVS105	4 credit hours distance
BUS131	4 credit hours distance
MTH070	4 credit hours distance

School records reflect MTH070 is a remedial class pursued via online or distance learning. Remedial or deficiency classes pursued via distance learning cannot be certified to VA. Additionally, the school calendar reflects the end date for this enrollment period was March 20, 2015. The correct enrollment for this period (the enrollment which VA could potentially justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
1-5-15/3-20-15	8 (dis)	\$993

The reduction effective February 16, 2015, was to 4 hours (dis) with tuition and fees of \$519.

Facts: In the case of M J Nordi (XXX XX 2226)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
1-5-15/3-29-15	12 (8 dis + 4 r/d)	\$1,467

A subsequent certification received by VA on February 23, 2015, reported a reduction to 8 hours (4 dis + 4 r/d) after drop/add period with non-punitive grades effective on February 16, 2015, with tuition and fees of \$993. A subsequent certification received by VA on April 3, 2015, reported unsatisfactory progress effective March 20, 2015. However, the school calendar reflects the end date for this enrollment period was March 20, 2015.

Facts: In the case of J D Raude (XXX XX 7512)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Airplane degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-28-15/1-3-16	15 (7 res + 8 dis)	\$26,885

A subsequent certification received from the school reported a reduction to 11 credit hours (7 res + 4 dis) effective December 18, 2015, with punitive grades assigned and tuition and fees of \$26,411. A subsequent certification received from the school reported a reduction to 4 credit hours (dis) effective January 3, 2016, with punitive grades assigned and tuition and fees of \$514. The school calendar reflects the dates for this enrollment period were September 28, 2015, through December 11, 2015. The student transcript reflects pursuit of Private Pilot Flight: Heli (AVS115) & Pro Pilot Ground (AVS110) during this term.

However, the invoices and other documents provided by the school reflect the training associated with these two classes occurred between October 20, 2015, and February 23, 2016. Additionally, the invoices and other financial documents received from the facility justify fees of only \$12,172.50 for the AVS115. However, the account history for this student reflects a course fee of \$21,603 for the AVS115 which was included in the amount of tuition and fees certified for this period. The correct enrollment for this period (the enrollment which VA could potentially justify benefits) should have been certified to VA as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-28-15/12-11-15	8 (dis)	\$993
10-20-15/12-11-15	7 (res)	\$16,461.50

Facts: In the case of J D Raude (XXX XX 7512)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Airplane degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-28-15/1-3-16	15 (7 res + 8 dis)	\$26,885

A subsequent certification received from the school reported a reduction to 11 credit hours (7 res + 4 dis) effective December 18, 2015, with punitive grades assigned and tuition and fees of \$26,411. A subsequent certification received from the school reported a reduction to 4 credit hours (dis) effective January 3, 2016, with punitive grades assigned and tuition and fees of \$514. The school calendar reflects the dates for this enrollment period were September 28, 2015, through December 11, 2015. The student transcript reflects student received punitive grades for all 15 credit hours. The report of reductions effective December 18, 2015, and January 3, 2016, were necessary.

Facts: In the case of J D Raude (XXX XX 7512)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Airplane degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
1-4-16/3-27-16	12 (dis)	\$1,427

AR04613

A subsequent certification received from the school reported a reduction to 4 credit hours (dis) effective March 27, 2016, with punitive grades assigned and tuition and fees of \$474. However, the school calendar reflects the dates for this enrollment period were January 4, 2016, through March 18, 2016. Additionally, the student transcript reflects student received punitive grades for all 12 credit hours. The report of reduction effective March 27, 2016, was unnecessary.

Facts: In the case of J D Raude (XXX XX 7512)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Airplane degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
3-28-16/6-19-16	16 (dis)	\$1,901

A subsequent certification received from the school reported a withdrawal effective June 10, 2016, with punitive grades assigned. However, the school calendar reflects the dates for this enrollment period were March 28, 2016, through June 10, 2016. Additionally, the student transcript reflects student received punitive grades for all 16 credit hours. The report of withdrawal effective June 10, 2016, was unnecessary.

Facts: In the case of D J Richc (XXX XX 9612)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
3-30-15/6-12-15	15 (3 res+8 dis+4 r/d)	\$1,667

A subsequent certification received by VA reported a reduction to 4 hours (dis) after drop/add period effective June 12, 2015, with punitive grades assigned with tuition and fees of \$479. A subsequent certification received by VA reported unsatisfactory progress effective June 12, 2015. However, none of these certifications were necessary to report as transcript reflects that student received punitive grades for all fifteen credit hours at end of term.

Facts: In the case of W J Rober (XXX XX 3166),

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-28-15/1-3-16	15 (7 res + 8 dis)	\$31,285

VA records reflect benefits were paid based on this certification. However, the school calendar reflects the end date for this period was December 11, 2015, not January 3, 2016. The correct enrollment for this period (the enrollment which VA could potentially justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-28-15/12-11-15	8 (dis)	\$993

Facts: In the case of W J Rober (XXX XX 3166),
Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
1-4-16/3-27-16	12 (dis)	\$1,427

VA records reflect benefits were paid based on this certification. However, the school calendar reflects the end date for this period was March 18, 2016, not March 27, 2016. The correct enrollment for this period (the enrollment which VA could potentially justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
1-4-16/3-18-16	12 (dis)	\$1,427

Facts: In the case of W J Rober (XXX XX 3166),
Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
3-28-16/6-19-16	13 (res)	\$26,934

VA records reflect benefits were paid based on this certification. However, the school calendar reflects the end date for this period was June 10, 2016, not June 19, 2016. The correct enrollment for this period (the enrollment which VA could potentially justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
3-28-16/6-10-16	13 (res)	\$26,934

AR04615

Facts: In the case of W J Rober (XXX XX 3166).

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
6-20-16/9-25-16	15 (4 res + 11 dis)	\$1,866.50

VA records reflect benefits were paid based on this certification. However, the school calendar reflects the end date for this period was August 19, 2016, not September 25, 2016. The correct enrollment for this period (the enrollment which VA could potentially justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
6-20-16/8-19-16	15 (4 res + 11 dis)	\$1,866.50

Facts: In the case of W J Rober (XXX XX 3166).

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-26-16/1-6-17	13 (res)	\$36,876

VA records reflect benefits were paid based on this certification. However, the school calendar reflects the end date for this period was December 9, 2016, not January 6, 2017. The correct enrollment for this period (the enrollment which VA could potentially justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-26-16/12-9-16	13 (res)	\$36,876

Facts: In the case of W R Sharp (XXX XX 0741)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-26-16/1-6-17	13 (6 res + 7 dis)	\$22,540.50

AR04616

VA records reflect benefits were paid based on this certification. The student's transcript reflects student was enrolled in the AAS Aviation Science-Helicopter degree program. The student's transcript reflects student was enrolled in five classes this period:

AVS107	VFR Refresher	1 credit hour
AVS125	Aircraft Systems	3 credit hours (dis)
AVS155	Applied Aerodynamics	4 credit hours (dis)
AVS210	Certified Flight Instructor	4 credit hours
AVS210L	CFI Lab	1 credit hour

The flight training records provided by the school reflect student was pursuing the training associated with the AVS107 class from September 26, 2016, through October 12, 2016. The flight training records also show student was pursuing the training associated with the AVS210 class from October 12, 2016, through January 25, 2017, and completed the Certified Flight Instructor (CFI) checkride on January 25, 2017. Based on this information the student did not begin pursuing all thirteen credit hours on September 26, 2016, nor pursue thirteen credit hours through January 6, 2017, as certified. Additionally, the school calendar reflects the end date for this period was December 9, 2016, not January 6, 2017.

Facts: In the case of W R Sharp (XXX XX 0741)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
1-9-17/3-24-17	9 (2 res + 7 dis)	\$15,798.50

A subsequent certification reported an increase in 14 credit hours (7 res + 7 dis) effective first day of term on January 9, 2017, with tuition and fees of \$30,318.50. VA records reflect benefits were paid based on this certification. The student's transcript reflects student was enrolled in the AAS Aviation Science-Helicopter degree program. The student's transcript reflects student was enrolled in five classes this period:

AVS140	Intro to unmanned	3 credit hours (dis)
AVS215	Certified Flight Instructor	4 credit hours
AVS215L	CFI Lab	1 credit hour
AVS245	External Load Heli	2 credit hours
AVS251	Aviation Law	4 credit hour (dis)

AR04617

The flight training records provided by the school reflect student was pursuing the training associated with the AVS215 class from January 27, 2017, through March 23, 2017. The flight training records also show student was pursuing the training associated with the AVS245 class from April 8, 2017, through April 20, 2017. Based on this information the student did not begin pursuing all fourteen credit hours on January 9, 2017, nor pursue fourteen credit hours through March 24, 2017, as certified.

Facts: In the case of L A Simsh (XXX XX 7596)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
6-20-16/9-25-16	14 (dis)	\$2,022.50

VA records reflect benefits were paid based on this certification. However, the school calendar reflects the end date for this period was August 19, 2016, not September 25, 2016. Additionally, the student transcript reflects no enrollment during the summer enrollment period. The transcript does, however, reflect student completed fourteen credit hours (distance) during the fall 2016 enrollment period from September 26, 2016, through December 9, 2016. The correct enrollment for this period (the enrollment which VA could potentially justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-26-16/12-9-16	14 (dis)	\$2,022.50

Facts: In the case of K M Taff (XXX XX 1688)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-28-15/1-3-16	15 (7 res + 8 dis)	\$26,885

VA records reflect benefits were paid based on this certification. However, the school calendar reflects the end date for this period was December 11, 2015, not January 3, 2016. The correct enrollment for this period (the enrollment which VA could potentially justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-28-15/12-11-15	8 (dis)	\$993

Facts: In the case of K M Taff (XXX XX 1688)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
1-4-16/3-27-16	12 (dis)	\$1,467

However, the school calendar reflects the end date for this period was March 18, 2016, not March 27, 2016. The correct enrollment for this period (the enrollment which VA could potentially justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
1-4-16/3-18-16	12 (dis)	\$1,467

Facts: In the case of K M Taff (XXX XX 1688)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
3-28-16/6-19-16	13 (7 res + 6 dis)	\$27,033

However, the school calendar reflects the end date for this period was June 10, 2016, not June 19, 2016. The correct enrollment for this period (the enrollment which VA could potentially justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
3-28-16/6-10-16	13 (7 res + 6 dis)	\$27,033

Facts: In the case of K M Taff (XXX XX 1688)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
6-20-16/9-25-16	13 (10 res + 3 dis)	\$36,925.50

However, the school calendar reflects the end date for this period was August 19, 2016, not September 25, 2016. The correct enrollment for this period (the enrollment which VA could potentially justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
6-20-16/8-19-16	13 (10 res + 3 dis)	\$36,925.50

Facts: In the case of K M Taff (XXX XX 1688)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-26-16/1-6-17	13 (7 res + 6 dis)	\$28,135

However, the school calendar reflects the end date for this period was December 9, 2016, not January 6, 2017. The correct enrollment for this period (the enrollment which VA could potentially justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-26-16/12-9-16	13 (7 res + 6 dis)	\$28,135

Facts: In the case of L T Thorb (XXX XX 9124)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment and tuition and fees. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
6-21-15/9-27-15	15 (7 res + 8 dis)	\$31,325

VA records reflect benefits were paid based on this certification. However, based on the student Account History document provided by the school the correct amount of tuition and fees charged for this term was \$31,285. The Account History document reflects student received a Federal Pell Grant in the amount of \$1,925 on July 16, 2015, and details an entry labelled "A/R refund check" for the amount of \$1,965 dated July 22, 2015. This would appear to indicate that the student's Pell Grant of \$1,925 plus an additional \$40 was refunded directly to the student. This additional \$40 originated from the VA payment of \$31,325 which the Account History document shows was credited to the student's account on July 22, 2015. Essentially, the school certified an extra \$40 in tuition and fees to VA which VA then paid, the school then subsequently issued this amount directly to the student. Additionally, the school calendar reflects the enrollment dates for this period were June 22, 2015, through August 21, 2015. The correct enrollment for this period (the enrollment which VA could potentially justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
6-22-15/8-21-15	15 (7 res + 8 dis)	\$31,285

AR04620

Facts: In the case of L T Thorb (XXX XX 9124)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment and tuition and fees. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Airplane degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-28-15/1-3-16	17 (10 res + 7 dis)	\$34,839.50

A subsequent certification received from the school reported effective September 28, 2015, student was enrolled in 14 credit hours (7 res + 7 dis) with tuition and fees of \$25,286. The certification included remarks stating "Student did not use any of the credits for AVS299". The student's transcript reflects student was enrolled in the AAS Aviation Science-Helicopter degree program and was enrolled in four classes this period:

AVS140	3 credit hour (dis)
AVS150	4 credit hours (dis)
AVS200	5 credit hours
AVS200L	2 credit hours

The school catalog reflects that the degree plan for this program lists the AVS299 class (Special Studies: Aviation Science) as an elective class. The records provided by the school reflect student was training in a Part 141 private pilot training program during this period. Documentation provided by the school reflects that the flight training for the AVS299 course involved contracted private pilot training and that student was certified in this class in order to obtain additional flight training hours in the private pilot program. The AVS299 class should not have been included in the initial certification of hours to VA. However, VA guidance on this issue instructs no adjudicative action is necessary for enrollments prior to December 31, 2015. School catalog reflects the AVS200 is the Instrument/Commercial Flight 1 Helicopter class and the AVS200L is the lab for this class. However, the dates of training associated with the Instrument and Commercial training do not correspond to the dates certified to VA. The invoices and other documents provided by the school reflect the training associated with these classes occurred between October 21, 2015, and May 3, 2016. This indicates that student did not begin all fourteen credit hours on September 28, 2015, and should not have been certified as such. Additionally, the invoices and other financial documents received from the facility justify fees of \$25,283.50 for this enrollment period. Further, the school calendar reflects the dates for this enrollment period were September 28, 2015, through December 11, 2015. The correct enrollment for this period (the enrollment which VA could potentially justify benefits) should have been certified to VA as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-28-15/12-11-15	7 (dis)	\$834.50
10-21-15/12-11-15	7 (res)	\$24,449

Facts: In the case of L T Thorb (XXX XX 9124)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment and tuition and fees. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Airplane degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
1-4-16/3-27-16	13 (10 res + 3 dis)	\$36,823

The student's transcript reflects student was enrolled in the AAS Aviation Science-Helicopter degree program and was enrolled in three classes this period:

AVS125	3 credit hour (dis)
AVS205	7 credit hours
AVS205L	3 credit hours

School catalog reflects the AVS205 is the Instrument/Commercial Flight 2: Helicopter class and the AVS205L is the lab for this class. However, the dates of training associated with the Instrument and Commercial training do not correspond to the dates certified to VA. The invoices and other documents provided by the school reflect the ground training associated with these classes occurred between October 21, 2015, and May 3, 2016; and the flight training occurred between February 4, 2016, and March 17, 2016. This indicates that student did not begin all thirteen credit hours on January 4, 2016, and should not have been certified as such. Additionally, the school calendar reflects the dates for this enrollment period were January 4, 2016, through March 18, 2016.

Facts: In the case of L T Thorb (XXX XX 9124)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
3-28-16/6-19-16	13 (5 res + 8 dis)	\$18,198

However, the school calendar reflects term dates for the spring 2016 enrollment period was March 28, 2016, to June 10, 2016. The initial enrollment for this period should have been certified to VA with an end date of June 10, 2016. A subsequent certification reported student was enrolled in zero hours this period effective April 18, 2016, with remarks of "Student is moving out of the area." This certification should have included information reflecting if the student received punitive or non-punitive grades and confirming that this was a report of termination of enrollment. A review of the student transcript confirmed that student received non-punitive grades for all hours this period. This action was, in effect, a termination after drop/add period with non-punitive grades assigned and should have been certified to VA as such.

Facts: In the case of L H Troun (XXX XX 1877)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment and tuition and fees. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-29-14/12-13-14	17 (res)	\$45,489

VA records reflect benefits were paid based on this certification. However, the flight training record obtained from the school reflect training dates from October 11, 2014, through June 15, 2015, but does not indicate for which class the training was conducted. The student did not begin flight training on the date certified. Additionally, the student Account History document reflects course fees of \$26,280 for AVS205L & \$17,470 for AVS200L for a total of \$43,750 in flight training related fees. However, the invoices show charges of only \$19,777 for training between October 11, 2014, and June 15, 2015. School failed to accurately report tuition and fees. The correct tuition and fee amount should have been reported as \$21,516 (17 hours X \$102 per credit hour + \$19,777 + \$5 = \$21,516). Further, the school calendar reflects the end date for this period was December 12, 2014, not December 13, 2014. The correct enrollment for this period (the enrollment which VA could potentially justify benefits) is as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
10-11-14/12-12-14	17 (res)	\$21,516

Facts: In the case of S C Urban (XXX XX 1496)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment and tuition and fees. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-29-14/12-13-14	12 (8 res + 4 dis)	\$21,319

VA records reflect benefits were paid based on this certification. The student's transcript reflects student was enrolled in the AAS Aviation Science-Helicopter degree program and was enrolled in four classes this period:

AVS100	4 credit hours
AVS299	1 credit hour
AVS200	5 credit hours
AVS200L	2 credit hours

AR04623

School catalog reflects the AVS299 class (Special Studies: Aviation Science) as an elective class. Documentation provided by the school reflects that the flight training for the AVS299 course involved contracted private pilot training and should not have been included in the certification of hours to VA. However, VA guidance on this issue instructs no adjudicative action is necessary for enrollments prior to December 31, 2015. Additionally, the flight training records reflect training from October 31, 2014, through November 21, 2015, and do not distinguish the training between AVS200, AVS200L and AVS299. This reflects that student did not begin all twelve credit hours on September 29, 2014, as certified. Additionally, the student Account History document provided by the school reflects student was charged a total of \$19,820 for course fees for AVS200, AVS200L and AVS299. However, the invoices for the flight training show a total of only \$4,882 in charges. Finally, the school calendar shows the fall 2014 enrollment dates were September 29, 2014, through December 12, 2014. Based on the total of this information the correct certification of this enrollment should have been as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-29-14/12-12-14	4 (dis)	\$479
10-31-14/12-12-14	8 (res)	\$5,698

Facts: In the case of S C Urban (XXX XX 1496)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
1-5-15/3-29-15	15 (7 res + 8 dis)	\$28,253

A subsequent certification reported a reduction on the first day of the term to 8 hours (dis) with tuition and fees of \$953. VA records reflect benefits were paid based on these certifications. However, the school calendar reflects the end date for this period was March 20, 2015, not March 29, 2015. Based on this information the correct certification of this enrollment should have been as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
1-5-15/3-20-15	8 (dis)	\$953

Facts: In the case of S C Urban (XXX XX 1496)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment and tuition and fees. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
6-21-15/9-27-15	12 (dis)	\$1,463.05

A subsequent certification received by VA reported a reduction to 8 hours (dis) effective September 27, 2015, after drop/add period with punitive grades and tuition and fees of \$989.50. VA records reflect benefits were paid based on these certifications. The student's transcript reflects student was enrolled in the AAS Aviation Science-Helicopter degree program. The student's transcript reflects student was enrolled in four classes this period:

AVS252	4 credit hour (dis)
CAS133	3 credit hours (dis)
CAS133L	1 credit hours (dis)
MTH070	4 credit hours (dis)

However, the student Account History document obtained from the school reflects the tuition and fees for the twelve hours certified totaled \$1,427. Additionally, school records show that the MTH070 was a remedial class conducted online which is not certifiable to VA. Further, the school calendar shows the summer 2015 enrollment dates were June 22, 2015, through August 21, 2015. Based on this information the correct certification of this enrollment should have been as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
6-22-15/8-21-15	8 (dis)	\$953

Facts: In the case of S C Urban (XXX XX 1496)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment and tuition and fees. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
6-21-15/9-27-15	12 (dis)	\$1,463.05

A subsequent certification received by VA reported a reduction to 8 hours (dis) effective September 27, 2015, after drop/add period with punitive grades and tuition and fees of \$989.50. However, the student transcript reflects student completed the term with punitive grades for all twelve credit hours. The certification of the reduction on the last day of the term was unnecessary and inaccurate.

Facts: In the case of K D Walke (XXX XX 3503)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
3-30-15/6-12-15	7 (res)	\$30,563

A subsequent certification received by VA reported a reduction to 4 (res) hours first day of term March 30, 2015, with tuition and fees of \$30,563. VA records reflect benefits were paid based on these certifications. The student's transcript reflects student was enrolled in the AAS Aviation Science-Helicopter degree program and was enrolled in two classes this period:

AVS107	1 credit hour
AVS205L	3 credit hours

School catalog reflects AVS205 is to be taken concurrently with AVS205L as a "co-requisite". Transcript shows student did not complete AVS205 until the spring 2016 term. Per school policy student should not have been enrolled in AVS205L due not concurrently enrolled in AVS205. Additionally, The AVS107 class is not listed in the 2014/2015 school catalog therefore it does not appear to be a requirement of the degree program. Further, the flight training record provided by the school reflects training in AVS205 & AVS205L between March 2, 2016, and April 29, 2017, and does not distinguish the training between AVS205L and AVS205. This reflects that student did not begin all four credit hours on March 30, 2015, as certified. Based on the total of this information no hours should have been certified to VA for this period due student did not meet the requirements to be enrolled in AVS205L and AVS107 was not required for the degree.

AR04626

Facts: In the case of K D Walke (XXX XX 3503)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
3-28-16/6-19-16	7 (res)	\$21,184

A subsequent certification received by VA reported a withdrawal from all credit hours effective June 19, 2016. VA records reflect benefits were paid based on these certifications. The student's transcript reflects student was enrolled in the AAS Aviation Science-Helicopter degree program and was enrolled in one class this period:

AVS205 7 credit hours

School catalog reflects AVS205L is to be taken concurrently with AVS205 as a "co-requisite". Transcript shows student completed AVS205L during the spring 2015 term. Per school policy student should not have been enrolled in AVS205 due not concurrently enrolled in AVS205L. Additionally, the flight training record provided by the school reflects training in AVS205 & AVS205L between March 2, 2016, and April 29, 2017, and does not distinguish the training between AVS205L and AVS205. This reflects that student did not begin the training associated with the credit hours related to AVS205 on March 28, 2016, as certified. Additionally, the school calendar reflects the end date for this period was June 10, 2016, not June 19, 2016, as certified. Based on the total of this information no hours should have been certified to VA for this period.

Facts: In the case of K D Walke (XXX XX 3503)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
3-28-16/6-19-16	7 (res)	\$21,184

A subsequent certification received by VA reported a withdrawal from all credit hours effective June 19, 2016. However, this certification was not necessary to report as transcript reflects that student received punitive grades for seven credit hours at end of term.

AR04627

Facts: In the case of M L Whipp (XXX XX 7657),
Student was a Chapter 33 recipient. The school failed to accurately report tuition and fees. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the Associate of Arts (Oregon Block Transfer) degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
3-31-14/6-13-14	12 (res)	\$1,591

However, the school invoice for this period reflects the tuition and fee amount of \$1591 included \$440 for book charges which are not mandatory fees. The correct tuition and fee amount which should have been certified to VA was as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
3-31-14/6-13-14	12 (res)	\$1,151

Facts: In the case of J A Willb (XXX XX 9626)
Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
1-5-15/3-29-15	15 (7 res + 8 dis)	\$25,295

VA records reflect benefits were paid based on this certification. However, the school calendar reflects the end date for this period was March 20, 2015, not March 29, 2016.

Facts: In the case of J A Willb (XXX XX 9626)
Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
6-21-15/9-27-15	7 (dis)	\$834.50

A subsequent certification received by VA reported an increase on first day of term to 8 hours (1 res + 7 dis) with tuition and fees of \$10,186.50. VA records reflect benefits were paid based on this certification. The student's transcript reflects student was enrolled in the AAS Aviation Science-Helicopter degree program. The student's transcript reflects student was enrolled in three classes this period:

AVS252	3 credit hour (dis)
AVS254	4 credit hours (dis)
AVS299	1 credit hours

The school catalog reflects that the degree plan for this program lists the AVS299 class (Special Studies: Aviation Science) as an elective class. Documentation provided by the school reflects that the flight training for the AVS299 course involved contracted private pilot training and should not have been included in the certification of hours to VA. However, VA guidance on this issue instructs no adjudicative action is necessary for enrollments prior to December 31, 2015.

Facts: In the case of J A Willb (XXX XX 9626)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
6-21-15/9-27-15	7 (dis)	\$834.50

A subsequent certification received by VA reported an increase on first day of term to 8 hours (1 res + 7 dis) with tuition and fees of \$10,186.50. VA records reflect benefits were paid based on this certification. However, the school calendar reflects the enrollment dates for this period were June 22, 2015, through August 21, 2015.

Facts: In the case of J A Willb (XXX XX 9626)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment and tuition and fees. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-28-15/1-3-16	12 (1 res + 11 dis)	\$4,260.50

A subsequent certification received by VA reported a reduction to 1 hour (res) effective November 20, 2015, with tuition and fees of \$2,952. VA records reflect benefits were paid based on these certifications. The student's transcript reflects student was enrolled in the AAS Aviation Science-Helicopter degree program. The student's transcript reflects student was enrolled in four classes this period:

AVS107	1 credit hour
CGS100	3 credit hours (dis)
MTH070	4 credit hours (dis)
WRI121	4 credit hours (dis)

AR04629

However, the AVS107 class is not listed in the 2014/2015 school catalog therefore it does not appear to be a requirement of the degree program. Additionally, school records show that the MTH070 was a remedial class conducted online which is not certifiable to VA. Further, the school calendar shows the fall 2015 enrollment dates were September 28, 2015, through December 11, 2015. Based on this information the correct certification of this enrollment should have been as follows:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-28-15/12-11-15	7 (dis)	\$834.50

Termination effective November 20, 2015

Facts: In the case of J A Willb (XXX XX 9626)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment and tuition and fees. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
1-4-16/3-27-16	14 (dis)	\$1,664

A subsequent certification received by VA reported a correction to 11 hours (dis) effective January 25, 2016, with tuition and fees of \$1,308.50. VA records reflect benefits were paid based on these certifications. The student's transcript reflects student was enrolled in the AAS Aviation Science-Helicopter degree program and in the MTH070 class this period. However, the MTH070 was a remedial class conducted online which is not certifiable to VA. Further, the school calendar shows the winter 2016 enrollment dates were January 4, 2016, through March 18, 2016.

Facts: In the case of J A Willb (XXX XX 9626)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
3-28-16/6-19-16	14 (10 res + 4 dis)	\$36,944

A subsequent certification received by VA reported a reduction to 10 hours (res) effective May 20, 2016, with tuition and fees of \$36,470. VA records reflect benefits were paid based on these certifications. However, the school calendar reflects the end date for this period was June 10, 2016, not June 19, 2016.

AR04630

Facts: In the case of J A Willb (XXX XX 9626)

Student was a Chapter 33 recipient. The school failed to accurately report enrollment. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
6-20-16/9-25-16	7 (dis)	\$834.50

A subsequent certification received by VA reported a reduction to 3 hours (dis) effective August 29, 2016, with tuition and fees of \$479. VA records reflect benefits were paid based on these certifications. However, the school calendar reflects the end date for this period was August 19, 2016, not September 25, 2016. Additionally, the transcript reflects student received punitive grades for all 7 credit hours. The report of reduction effective August 29, 2016, was unnecessary.

Evaluation: The majority of this discrepancy involves the certification of enrollment end dates which appear to have been edited to ensure students receive Chapter 33 housing allowance between established terms published in the school calendar. However, the determination as to student eligibility to the housing allowance under Ch33 is an adjudicative function of VA. Schools should not edit enrollment dates for the purpose of ensuring that students receive Ch33 housing benefits between established enrollments. KCC enrollment periods are typically standard quarter hour terms which VA considers to be ten to thirteen weeks in length. Generally, enrollments certified to VA should reflect dates which correspond to the school's academic calendar. Exceptions to this can be found in the SCO Handbook available on the GI Bill website. If the school operates any non-standard terms there should typically be multiple students also pursuing these same non-standard terms, specifically non-veteran students. Any non-standard terms individualized to specific students would possibly demonstrate a separate program and impact the reporting of the 85/15 calculations.

Several occurrences were discovered of the MTH070 class being certified to VA. MTH070 is a remedial class conducted online which is not certifiable to VA.

Several occurrences were discovered of the AVS107 class being certified to VA. AVS107 is not listed in the 2014/2015 school catalog therefore it does not appear to be a requirement of the degree program and should not be certified to VA.

Documentation provided by the school reflects that the flight training for the AVS299 course involved contracted private pilot training and should not have been included in the certification of hours to VA. However, VA guidance on this issue instructs no adjudicative action is necessary for enrollments prior to December 31, 2015.

Several occurrences were discovered of certification of a reduction of credit hours or withdrawal from all credit hours effective on the last day of the term. In all of these instances this certification was not necessary to report as the student transcript reflected receipt of punitive grades for the hours reported.

Several occurrences were discovered where the student did not begin flight training on the date certified or within seven calendar days of the beginning date of a published term.

The facility promptly notified VA when beneficiaries terminated or interrupted training. (38 CFR §21.4203, 21.7156, 21.9735)

Facts: In the case of R B Flowe (XXX XX 3328)

Student was a Chapter 33 recipient. The school failed to promptly notify VA of student termination. A Notice of Change in Student Status form (VA Form 22-1999b) received by VA on May 5, 2015, reported a student withdrawal effective April 3, 2015. The notice of this change was received by VA more than 30 days from effective date.

Facts: In the case of C E Mann (XXX XX 1395)

Student was a Chapter 33 recipient. The school failed to promptly notify VA of student termination. A Notice of Change in Student Status form (VA Form 22-1999b) received by VA on February 29, 2016, reported a student withdrawal effective October 2, 2015. The notice of this change was received by VA more than 30 days from effective date.

Evaluation: School failed to promptly notify VA of terminations of enrollment. For the purposes of prompt notification VA should be informed of termination within thirty days of the effective date of the termination.

The facility promptly notified VA when beneficiaries did not progress satisfactorily according to approved standards and practices of the facility. (38 CFR § 21.4203(d), 21.4277)

Facts: In the case of A C Grant (XXX XX 0942)

Student was a Chapter 33 recipient. The school failed to promptly notify VA of unsatisfactory progress. A Notice of Change in Student Status form (VA Form 22-1999b) received by VA on January 18, 2017, reported termination effective March 27, 2016, due to unsatisfactory progress. The notice of this notice was received by VA more than 30 days from effective date.

Evaluation: School failed to promptly notify VA of unsatisfactory progress. For the purposes of prompt notification VA should be informed within thirty days of the effective date of the unsatisfactory progress.

AR04632

The facility promptly notified VA of any changes in credit or clock hours, or tuition & fees, that would affect the amount of payment to beneficiaries. (38 CFR §21.4203, 21.7156(b), 21.9735)

Facts: In the case of J K Binni (XXX XX 1159),

Student was a Chapter 33 recipient. The school failed to promptly notify VA of changes in tuition and fees. A Notice of Change in Student Status form (VA Form 22-1999b) received by VA on September 28, 2016, reported a reduction of credit hours and amended tuition and fees for the term beginning March 28, 2016. This change was effective June 19, 2016. The notice of this change was received by VA more than 30 days from effective date.

Facts: In the case of J W Cowan (XXX XX 5097),

Student was a Chapter 33 recipient. The school failed to promptly notify VA of changes in tuition and fees. A Notice of Change in Student Status form (VA Form 22-1999b) received by VA on February 29, 2016, reported a reduction in credit hours for the term beginning March 30, 2015. This change was effective March 30, 2015. The notice of this change was received by VA more than 30 days from effective date.

Facts: In the case of R B Flowe (XXX XX 3328)

Student was a Chapter 33 recipient. The school failed to promptly notify VA of changes in tuition and fees. A Notice of Change in Student Status form (VA Form 22-1999b) received by VA on February 29, 2016, reported a reduction in credit hours and amended tuition and fees for the term beginning June 22, 2015. This change was effective June 22, 2015. The notice of this change was received by VA more than 30 days from effective date.

Facts: In the case of R W Jones (XXX XX 0124)

Student was a Chapter 33 recipient. The school failed to promptly notify VA of changes in tuition and fees. A Notice of Change in Student Status form (VA Form 22-1999b) received by VA on March 28, 2017, reported corrected tuition and fee amount for the term beginning January 9, 2017. This change was effective January 9, 2017. The notice of this change was received by VA more than 30 days from effective date.

Facts: In the case of J M Louis (XXX XX 3907)

Student was a Chapter 33 recipient. The school failed to promptly notify VA of changes in tuition and fees. A Notice of Change in Student Status form (VA Form 22-1999b) received by VA on February 29, 2016, reported a reduction in credit hours and amended tuition and fees for the term beginning March 30, 2015. This change was effective March 30, 2015. The notice of this change was received by VA more than 30 days from effective date.

AR04633

Facts: In the case of J M Louis (XXX XX 3907)

Student was a Chapter 33 recipient. The school failed to promptly notify VA of changes in tuition and fees. A Notice of Change in Student Status form (VA Form 22-1999b) received by VA on February 29, 2016, reported a reduction in credit hours for the term beginning September 28, 2015. This change was effective September 28, 2015. The notice of this change was received by VA more than 30 days from effective date.

Facts: In the case of C R Marti (XXX XX 4862)

Student was a Chapter 33 recipient. The school failed to promptly notify VA of changes in tuition and fees. A Notice of Change in Student Status form (VA Form 22-1999b) received by VA on February 29, 2016, reported a reduction in credit hours and amended tuition and fees for the term beginning March 30, 2015. This change was effective March 30, 2015. The notice of this change was received by VA more than 30 days from effective date.

Facts: In the case of L T Thorb (XXX XX 9124)

Student was a Chapter 33 recipient. The school failed to promptly notify VA of changes in tuition and fees. A Notice of Change in Student Status form (VA Form 22-1999b) received by VA on November 19, 2015, reported (in effect) a reduction in credit hours and amended tuition and fees for the term beginning September 28, 2015. This change was effective September 28, 2015. The notice of this change was received by VA more than 30 days from effective date.

Facts: In the case of S C Urban (XXX XX 1496)

Student was a Chapter 33 recipient. The school failed to promptly notify VA of changes in tuition and fees. A Notice of Change in Student Status form (VA Form 22-1999b) received by VA on August 24, 2015, reported a reduction in credit hours and amended tuition and fees for the term beginning January 5, 2015. This change was effective January 5, 2015. The notice of this change was received by VA more than 30 days from effective date.

Facts: In the case of K D Walke (XXX XX 3503)

Student was a Chapter 33 recipient. The school failed to promptly notify VA of changes in credit hours and tuition and fees. A Notice of Change in Student Status form (VA Form 22-1999b) received by VA on April 28, 2016, reported a reduction in credit hours for the term beginning March 30, 2015. This change was effective March 30, 2015. The notice of this change was received by VA more than 30 days from effective date.

Evaluation: School failed to promptly notify VA of any changes in credit or clock hours, or tuition & fees. For the purposes of prompt notification VA should be informed within thirty days of the effective date.

AR04634

School has failed to define the specific amount of flight training hours required and mandatory fees for the flight degree programs as per VA policy and applicable regulations

Facts: In the case of D T Auten (XXX XX 2725),
Student was a Chapter 33 recipient.

Facts: In the case of J L Bende (XXX XX 0622),
Student was a Chapter 33 recipient.

Facts: In the case of J K Binni (XXX XX 1159),
Student was a Chapter 33 recipient.

Facts: In the case of R M Calki (XXX XX 5972),
Student was a Chapter 33 recipient.

Facts: In the case of J W Cowan (XXX XX 5097),
Student was a Chapter 33 recipient.

Facts: In the case of R B Flowe (XXX XX 3328)
Student was a Chapter 33 recipient.

Facts: In the case of D L Ganno (XXX XX 5292),
Student was a Chapter 33 recipient.

Facts: In the case of S R Gayle (XXX XX 7004)
Student was a Chapter 33 recipient.

Facts: In the case of A C Grant (XXX XX 0942)
Student was a Chapter 33 recipient.

Facts: In the case of N C Harri (XXX XX 0704)
Student was a Chapter 33 recipient.

Facts: In the case of R W Jones (XXX XX 0124)
Student was a Chapter 33 recipient.

Facts: In the case of K E Kauff (XXX XX 9285)
Student was a Chapter 33 recipient.

Facts: In the case of D W Larim (XXX XX 4893)
Student was a Chapter 33 recipient.

Facts: In the case of N L Lawso (XXX XX 7037)
Student was a Chapter 33 recipient.

Facts: In the case of J M Louis (XXX XX 3907)
Student was a Chapter 33 recipient.

Facts: In the case of R A Lupke (XXX XX 6940)
Student was a Chapter 33 recipient.

Facts: In the case of C E Mann (XXX XX 1395)
Student was a Chapter 33 recipient.

Facts: In the case of C R Marti (XXX XX 4862)
Student was a Chapter 33 recipient.

Facts: In the case of CR Montg (XXX XX 3574)
Student was a Chapter 33 recipient.

Facts: In the case of M J Nordi (XXX XX 2226)
Student was a Chapter 33 recipient.

Facts: In the case of J D Raude (XXX XX 7512)
Student was a Chapter 33 recipient.

Facts: In the case of D J Richc (XXX XX 9612)
Student was a Chapter 33 recipient.

Facts: In the case of W J Rober (XXX XX 3166).
Student was a Chapter 33 recipient.

Facts: In the case of W R Sharp (XXX XX 0741)
Student was a Chapter 33 recipient.

Facts: In the case of L A Simsh (XXX XX 7596)
Student was a Chapter 33 recipient.

Facts: In the case of K M Taff (XXX XX 1688)
Student was a Chapter 33 recipient.

Facts: In the case of L T Thorb (XXX XX 9124)
Student was a Chapter 33 recipient.

Facts: In the case of L H Troun (XXX XX 1877)
Student was a Chapter 33 recipient.

Facts: In the case of S C Urban (XXX XX 1496)
Student was a Chapter 33 recipient.

Facts: In the case of K D Walke (XXX XX 3503)
Student was a Chapter 33 recipient.

Facts: In the case of J A Willb (XXX XX 9626)
Student was a Chapter 33 recipient.

Facts: In the case of M B Wolf (XXX XX 0012)
Student was a Chapter 33 recipient.

Evaluation: School has failed to define the specific amount of flight training hours required for the flight degree programs as per VA policy and applicable regulations. Student was pursuing flight training as part of a standard degree program. However, benefits are not payable due to the specific number of training hours and all mandatory fees required for the private pilot class were not defined with the program approval as per statutory requirements. The flight training hours required for a student to obtain the required knowledge in order to meet this educational objective is not clearly defined in the school catalog or other approval documents. As per VA guidance and relevant regulations schools must state how much training (i.e., how many flight hours) is required for the program and cannot be written in terms of in terms of “training to proficiency.” Additionally, the school could not have conducted any approved in-house private pilot training prior to January 7, 2017, due to no direct-hire of any Certified Flight Instructor (CFI) prior to that date.

Relevant regulations and guidance

38 CFR 21.4235

38 CFR 21.7020(b)(23)

38 CFR 21.4253

38 CFR 21.4252

38 CFR 21.9710

38 CFR 21.4203

38 CFR 21.7156(b)

38 CFR 21.9735

Email of 4-24-15 from Bill Spruce, VACO concerning “Limitations on flight hours when part of a standard degree program” (sent from MM on 4-27-15)

AR04637

Benefits not payable for any flight degree program for any terms after 11-1-15 due school did not have an approvable/payable flight degree program.

Facts: All 33 students enrolled in either of the two flight degree programs.

Evaluation: Flight training hours are either not defined as per statutory requirements or are based on a Training Course Outline (TCO) for a program which VA has not approved. Based on the Compliance & Liaison Advisory dated September 1, 2015, schools were instructed to amend their catalogs within 60 days so that they document the specific number of training hours and all mandatory fees. Consequently, as of November 1, 2015, all flight training hours required for any flight degree program and all mandatory fees should be defined. Personnel documentation reviewed at the school reflected no direct hire of any certified flight instructor (CFI) prior to January 7, 2017. So, the school could not have conducted any approved in-house private pilot training prior to January 7, 2017. The language in the Compliance & Liaison Advisory dated December 4, 2015, directed that no contracted private pilot instruction could be paid for any period after August 1, 2016. Additionally, KCC did not have the required/defined training hours for any private pilot classes approved by SAA/accepted by VA. These hours are not listed on the most recently approved VIB (2015-16 effective October 1, 2015), nor are they defined in the 2014-15, 2015-16 or 2016-17 school catalogs. Based on the total of this information KCC could not have had an approvable/payable flight degree program as of November 1, 2015. After consultation with Coach Sherry Scott on October 27, 2017, the decision was made that no benefits (for any class) should be paid for any VA student enrolled in any of the flight degree programs for any period beginning on or after November 1, 2015. For periods prior to November 1, 2015, no adjudicative action would be taken based on this issue.

School failed to follow applicable provision of law. Student could not have been qualified to begin instrument or commercial flight training on date specified.

Facts: In the case of R M Calki (XXX XX 5972),

Student was a Chapter 33 recipient. School failed to follow all applicable provision of law. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
6-20-16/9-25-16	7 (res)	\$26,422

Student transcript reflects enrollment the following classes this period:

AVS200	Instrument/Commercial Flight 1: Helicopter
AVS200L	Instrument/Commercial Flight 1 Lab: Helicopter

However, per relevant FAA regulations the student could not have been qualified to begin any Instrument or Commercial Flight training program on June 20, 2016. School documents reflect student completed the Private Pilot check ride on August 1, 2016.

Student could not have been qualified to begin an instrument or commercial flight training prior to August 1, 2016, since the records reflect student did not possess a private pilot license on the date enrollment began. Per FAR Title 14 Part 141 Appendix C student must hold a private pilot license prior to enrolling in any Part 141 Instrument or Commercial flight training program.

Facts: In the case of D W Larim (XXX XX 4893)

Student was a Chapter 33 recipient. School failed to follow all applicable provision of law. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in the AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
3-30-15/6-12-15	14 (10 res + 4 dis)	\$18,969

A subsequent certification received by VA reported an reduction to 11 hours (7 res + 4 dis) with tuition and fees of \$18,663. VA records reflect benefits were paid based on this certification. The student transcript reflects enrollment the following classes this period:

WRI121	English Composition I
AVS150	Meteorology 1
AVS200	Instrument/Commercial Flight 1: Helicopter
AVS200L	Instrument/Commercial Flight 1 Lab: Helicopter

However, per relevant FAA regulations the student could not have been qualified to begin any Instrument or Commercial Flight training program on March 30, 2015. School documents reflect student completed the Private Pilot check ride on November 11, 2015. Student could not have been qualified to begin an instrument or commercial flight training prior to November 11, 2015, since the records reflect student did not possess a private pilot license on the date enrollment began. Per FAR Title 14 Part 141 Appendix C student must hold a private pilot license prior to enrolling in any Part 141 Instrument or Commercial flight training program.

Evaluation: The school records reflect that the school failed to follow the requirements of FAR Title 14 Part 141 as it pertains to flight training students having a private pilot license on the date of enrollment in any Part 141 Instrument or Commercial flight training program.

AR04639

School failed to follow its own policy concerning incomplete grades. Records show student was given more time than school policy stipulates to convert I grade.

Facts: In the case of R B Flowe (XXX XX 3328)

Student was a Chapter 33 recipient. School failed to follow its own policy concerning incomplete grades. The Enrollment Certifications (VA Form 22-1999) received by VA, reported student was enrolled in AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
1-5-15/3-29-15	11 (7 res + 4 dis)	\$18,663

A subsequent certification received by VA reported a reduction of 7 (res) hours to 4 hours (dis) after drop/add period effective March 29, 2015, with punitive grades assigned with tuition and fees of \$474. Records show student initially completed the term with incomplete grades for seven credit hours. Per the school catalog the school policy for incomplete grades instructs "Course requirements must be completed within a maximum of one term after the end of the term for which the "I" grade is received." However, documents from the school reflect student was given more time than school policy stipulates to convert I grade. Records show student initially received an "I" grade for attempting the AVS200 and AVS200L classes during this period. Per school policy the student had until June 12, 2015, to complete all course requirements for these classes. However, a Grade Change Request form obtained from the school reflects that on January 6, 2016, the "I" grades were converted to F grades (punitive) for these 2 classes.

Facts: In the case of J M Louis (XXX XX 3907)

Student was a Chapter 33 recipient. School failed to follow its own policy concerning incomplete grades. The Enrollment Certifications (VA Form 22-1999) received by VA, reported student was enrolled in AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
1-5-15/3-29-15	15 (7 res + 8 dis)	\$25,295

AR04640

A subsequent certification received by VA reported a reduction of 7 (res) hours to 8 hours (dis) after drop/add period effective March 29, 2015, with punitive grades assigned with tuition and fees of \$993. Records show student initially completed the term with incomplete grades for seven credit hours. Per the school catalog the school policy for incomplete grades instructs "Course requirements must be completed within a maximum of one term after the end of the term for which the "I" grade is received." However, documents from the school reflect student was given more time than school policy stipulates to convert I grade. Records show student initially received an "I" grade for attempting the AVS110 and AVS115 classes during this period. Per school policy the student had until June 12, 2015, to complete all course requirements for these classes. However, a Grade Change Request form obtained from the school reflects that on February 1, 2016, the "I" grades were converted to F grades (punitive) for these 2 classes.

Facts: In the case of CR Montg (XXX XX 3574)

Student was a Chapter 33 recipient. School failed to follow its own policy concerning incomplete grades. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in AAS Aviation Science Airplane degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-28-15/1-3-16	7 (res)	\$16,415

A subsequent certification received by VA reported student withdrew from all hours effective January 3, 2016, receiving punitive grades for all 7 credit hours.

Student transcript reflects enrollment the following classes this period:

AVS100	(4 credit hours) Intro to Aviation
AVS112	(3 credit hours) Professional Pilot Ground School
AVS117	(4 credit hours) Private Pilot Flight: Airplane

Records show student initially completed the term with incomplete grades for seven credit hours. Per the school catalog the school policy for incomplete grades instructs "Course requirements must be completed within a maximum of one term after the end of the term for which the "I" grade is received." However, documents from the school reflect student was given more time than school policy stipulates to convert I grade. Records show student initially received an "I" grade for attempting the AVS112 and AVS117 classes during this period. Per school policy the student had until March 18, 2016, to complete all course requirements for these classes. However, a Grade Change Request form obtained from the school reflects that on September 27, 2016, the "I" grades were converted to F grades (punitive) for these 2 classes.

AR04641

Facts: In the case of J D Raude (XXX XX 7512)

Student was a Chapter 33 recipient. School failed to follow its own policy concerning incomplete grades. An Enrollment Certification (VA Form 22-1999) received by VA, reported student was enrolled in AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
9-28-15/1-3-16	15 (7 res + 8 dis)	\$26,885

A subsequent certification received from the school reported a reduction to 11 credit hours (7 res + 4 dis) effective December 18, 2015, with punitive grades assigned and tuition and fees of \$26,411. A subsequent certification received from the school reported a reduction to 4 credit hours (dis) effective January 3, 2016, with punitive grades assigned and tuition and fees of \$514. Records show student initially completed the term with incomplete grades for seven credit hours. Per the school catalog the school policy for incomplete grades instructs "Course requirements must be completed within a maximum of one term after the end of the term for which the "I" grade is received." However, documents from the school reflect student was given more time than school policy stipulates to convert I grade. Records show student initially received an "I" grade for attempting the AVS110 and AVS115 classes during this period. Per school policy the student had until March 18, 2016, to complete all course requirements for these classes. However, a Grade Change Request form obtained from the school reflects that on August 25, 2016, the "I" grades were converted to F grades (punitive) for these 2 classes.

Facts: In the case of K M Taff (XXX XX 1688)

Student was a Chapter 33 recipient. School failed to follow its own policy concerning incomplete grades. The Enrollment Certifications (VA Form 22-1999) received by VA, reported student was enrolled in AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
6-20-16/9-25-16	13 (10 res + 3 dis)	\$36,925.50

Records show student initially completed the term with incomplete grades for ten credit hours. Per the school catalog the school policy for incomplete grades instructs "Course requirements must be completed within a maximum of one term after the end of the term for which the "I" grade is received." However, documents from the school reflect student was given more time than school policy stipulates to convert I grade. Records show student initially received an "I" grade for attempting the AVS205 and AVS205L classes during this period. Per school policy the student had until December 9, 2016, to complete all course requirements for these classes. However, a Grade Change Request form obtained from the school reflects that on March 27, 2017, the "I" grades were converted to B grades (punitive) for these 2 classes.

Facts: In the case of K D Walke (XXX XX 3503)

Student was a Chapter 33 recipient. School failed to follow its own policy concerning incomplete grades. The Enrollment Certifications (VA Form 22-1999) received by VA, reported student was enrolled in AAS Aviation Science Helicopter degree program for the following term:

<u>Enrollment dates</u>	<u>Hours</u>	<u>Tuition and fees</u>
3-28-16/6-19-16	7 (res)	\$21,184

A subsequent certification received by VA reported a withdrawal from all credit hours effective June 19, 2016. Records show student initially completed the term with incomplete grades for seven credit hours. Per the school catalog the school policy for incomplete grades instructs "Course requirements must be completed within a maximum of one term after the end of the term for which the "I" grade is received." However, documents from the school reflect student was given more time than school policy stipulates to convert I grade. Records show student initially received an "I" grade for attempting the AVS205 class during this period. Per school policy the student had until August 19, 2016, to complete all course requirements for these classes. However, an internal memo dated June 30, 2017, obtained from the school indicates the student had an extension until June 16, 2017, to complete the requirements for the class. The document also states that the "I" grade was converted to F grades (punitive) for this class effective June 30, 2017.

Evaluation: Per the school catalog the school policy for incomplete grades instructs "Course requirements must be completed within a maximum of one term after the end of the term for which the "I" grade is received." However, documents from the school reflect students were given more time than school policy stipulates to convert I grade. VA reasonably expects schools to follow their own policies as stated in their official publications. If the school has exceptions to written policies those exceptions should be included in said policies.

Relevant regulations and guidance

38 CFR 21.4203
38 CFR 21.7156(b)
38 CFR 21.9735